sent 2/12/09

KANSAS

DEPARTMENT OF HEALTH
AND ENVIRONMENT

Kathleen Sebelius, Governor
Roderick L. Bremby, Secretary

www.kdheks.gov

NOTICE OF NON-COMPLIANCE

February 11, 2009

RCRA

550181

Mr. George Jones
Robbie Manufacturing Inc.
10810 Mid-America Avenue
Lenexa, Kansas 66219

Re: February 10-11, 2009 Compliance Inspection at Robbie Manufacturing, Inc. Lenexa, Johnson County, EPA ID# KSD 054 080 148

Dear Mr. Jones,

On February 10-11, 2009, a routine solid waste inspection was conducted at Robbie Manufacturing's Lenexa, Kansas to determine compliance with Kansas Administrative Regulations (KAR) and Kansas Statutes Annotated (KSA). This inspection was authorized under KAR 28-31-12. During the inspection, the following violations and concerns were identified:

Violation 1: Failure to determine if waste is hazardous waste, per K.A.R. 28-31-4(b), for fluorescent lamps described as currently being discarded in the trash. As we discussed, the Company must either provide a waste determination for its waste lamps or demonstrate that the lamps are being recycled as a Universal Waste. Please refer to the information contained within the compact disc provided to you during the inspection.

Violation 2: Failure to mark storage container(s) of hazardous waste with the words "Hazardous Waste", per K.A.R. 28-31-4(g)(3), for one unmarked 55-gallon drum of solvent waste observed in the central storage area. This Violation was corrected during the inspection.

Violation 3: Failure to close each satellite accumulation container of hazardous waste except when adding or removing waste, per K.A.R. 28-31-4(j) (1) (A), for one 55-gallon metal drum with an open funnel lid, observed in the satellite collection area. In order for a container with a funnel to be considered closed, the lid or flap must fit tightly against the rim of the funnel to prevent the escape of vapors.

Violation 4: Failure to adhere to requirements for training, per K.A.R. 28-31-4(g) (4)/40 CFR 265.16(d) (3). The Company's training documents did not include the following required elements:

a) Job title for each position related to hazardous waste management and the name of the employee filling each job.
b) Not all job descriptions identify the type and amount of training to be given to employee(s)
c) Not all job descriptions described in training plan were produced during inspection (including job description for George Jones)
d) Not all job descriptions include a description of hazardous waste duties

e) Company did not produce demonstration of annual training for George Jones or Dave Wagner

To correct this violation, please submit written demonstration that the aforementioned training requirements have been met.

Concern 1:
The facility has a single spill kit identified in its contingency plan, located in the ink room. During the inspection, I observed that this spill kit is a significant distance from the other waste storage areas in the plant. I recommended that Robbie Manufacturing consider placing spill control equipment in those areas of the plant where large quantities of hazardous waste are being accumulated or stored.

Concern 2: Management of solvent-saturated rags, pre-centrifuge
On the day of the inspection, I observed multiple collection containers holding solvent-saturated rags. These were described as pending centrifuge processing by Walker Towel. The containers of rags observed were not marked with the words "hazardous waste". At the time of the inspection, the applicability of K.A.R. 28-31-4(g)(3) to the containers observe was unclear. This issue has been forwarded to the Bureau of Waste Management (BWM) for their review and interpretation.

Concern 3: Marking of waste solvent tank
On the day of the inspection, I observed a standing tank described as a collection vessel for hazardous waste solvent. The tank was not marked. At the time of the inspection, the applicability of K.A.R. 28-31-4(g)(3) to this tank was unclear. This concern has been forwarded to the Bureau of Waste Management (BWM) for their review and interpretation.

No later than March 13, 2009, Robbie Manufacturing Inc. must provide a written response addressing violations and concerns cited.

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection.

Your cooperation with the waste management program is appreciated. If you have questions concerning this letter, please call me at (785) 842-4600.

Respectfully,

Laura D. Routh, CHMM
Waste Management Program, NE District Office
Bureau of Environmental Field Services

cc: Jim Rudeen, BWM
Rebecca Wenner, BWM
NEDO file

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

BUREAU OF WASTE MANAGEMENT
BUREAU OF ENVIRONMENTAL FIELD SERVICES

COMPLIANCE INSPECTION CHECKLIST
HAZARDOUS WASTE COVER PAGE

General ☐ **Routine** ☐ **Complaint**

EPA/ ID/Permit No. KSD ~~000 651 307~~ 054 080 148 T.E. 3.25.09 Time 12:30 pm Date 2/10-11/09

Facility Name Robbie Manufacturing Inc. District NE

Street 10810 Mid-America Avenue City Lenexa ,KS ZIP 66219

Mailing Address (if different than above) same

County Johnson Number of Employees 100

Phone 913-492-6328 Fax 913-492-1543 e-mail georgej@robbiemfg.com

Contact(s) George Jones Inspector(s) Laura D. Routh

Type of Business flexographic printing of food packaging bags and wrapping

Operating Hours and Days 24 hrs a day/5 days a week

Lat/Long Location Method: _____ Lat/Long Location Feature: _____

Latitude: (e.g. 37.57621) _____ Longitude: (e.g. -101.57621) _____

Has the Lat/Long been entered in the SW database? Yes ☐ No ☐

Hazardous Waste Inspection: ☒ Yes ☐ No

Generator Classification: ☐ Closed/Inactive ☐ Small Qty. Generator ☒ EPA Generator ☐ Not a Generator ☐ Kansas Generator ☐ Transporter

Other Regulated Activities: (complete applicable checklist) ☐ T/S/D Facility ☒ Tank System ☐ Subpart BB ☐ Universal Waste Activities

Has the company declared any information/processes as trade secrets KSA 65-3447? no
If yes, explain: _____

If facility is closed/inactive, or has recently moved please provide a brief description.

Used Oil Activities: ☒ Yes ☐ No

Does the facility have a total above-ground storage capacity of used oil (excluding containers less than 55-gallons) of more than 1,320 gallons? ☐ Yes ☒ No ☐ NA

If yes, then the facility is subject to SPCC requirements due to used oil activities.
Does the facility have a SPCC Plan? ☐ Yes ☒ No ☐ NA

Facility Used Oil Activities (Attach a checklist for each one marked):

☒ Generator
☐ Transporter / Transfer Facility
☐ Used Oil Burner (Off-Spec Fuel)
☐ Collection Center / Aggregation Point
☐ Used Oil Processor / Re-Refiner
☐ Used Oil Marketer

Attach all applicable checklists.

HAZARDOUS WASTE GENERATOR
COMPLIANCE INSPECTION CHECKLIST

WASTE STREAM TABLE

(List all hazardous wastes first, followed by solid wastes.)

Waste Description or Process	Hazardous Waste Codes (or universal, recycled, exempt, or non-hazardous)	Waste Determination Method (process knowledge or analytical data)	Waste Amount Generated Per Month	Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (name of TSDF, MSWLF, recycler, etc.)
Waste ink and solvents	D001	analytical	4000-8000 pounds a month shipped	2 totes 4 drums	2/1/09	WRR via Barton Solvents
Solid hazardous wastes including ink stained gloved and residues from press operations	D001 (facility shipping as hazardous but not certain)	knowledge	5 drums a month @ 150 lbs per drum	1 drum	2/2/09	WRR via Barton Solvents
Fluorescent bulbs	To Be Determined (TBD)	TBD	6-8 bulbs a month	none	n/a	Deffenbaugh Johnson County Landfill
Used oil	exempt	knowledge	2 drums a year	1 drum	n/a	Safety Kleen
Empty Drums	exempt	knowledge	16 a month	~10	n/a	A-1 Barrel
Trash	Non-hazardous	knowledge	2 compactors a week	n/a	n/a	Deffenbaugh Johnson County Landfill
Waste Film	recycled	knowledge	2500 lbs a week	n/a	n/a	Spot market
Rags	Centrifuged then laundered	TBD	2500 rags a week	1 drum observed	Not marked	Walker towel, post centrifuge

RCRA Compliance Evaluation Inspection Summary

Robbie Manufacturing Inc.
10810 Mid-America Ave.
Lenexa, Kansas 66219

EPA ID No.: KSD 054 080 148

Inspection Dates: February 10-11, 2009

KDHE Inspector: Laura D. Routh, CHMM
Bureau of Environmental Field Services
Northeast District Office (NEDO)

1.0 INTRODUCTION

On February 10-11, 2009, I conducted a routine compliance inspection at the facility referenced above to determine compliance with the State of Kansas waste regulations. The focus of the inspection was to identify types of wastes generated, points of waste generation, methods of waste management, and review relevant documents. This inspection was conducted under the authority of Kansas Administrative Regulation (K.A.R.) 28-31-12.

The facility manufactures plastic bags and plastic packaging for the food industry. The facility consists of one main building and an adjoining warehouse that encompasses a total of approximately 95,000 square feet. There is a truck lot on the north side of the building and a small parking lot on the south side. Based on the company's declaration and the waste generation rates identified during the inspection, the facility is an EPA Generator. The facility holds an air permit, Source ID# 0910055.

2.0 CHANGES SINCE PREVIOUS INSPECTION

The facility was previously inspected June 29, 2005 by Aretha Gomiller, NEDO, as an EPA Generator. Since that inspection, the facility has begun an expansion and remodeling of their office space and reduced working shifts to 5 days a week. No other process changes have occurred since that time. The company recently bought a neighboring building, located at 10850 Mid America Avenue. This building previously housed Midland Research Laboratories, EPA ID# KSD 062 712 013. Mr. Jones stated that Robbie Manufacturing uses the building for storage and also leases a part of the building to their sub-contractor, Art Lithocraft, who processed printing plates for Robbie. Mr. Jones stated that any waste generated by Art Lithocraft would be managed and disposed from that location and was the responsibility of Art Lithocraft.

3.0 PREVIOUS VIOLATIONS

June 29, 2005 Inspection:

1. K.A.R. 28-31-4(g)(4)/40 CFR 265.52(d): Failure to include the city and state in the address of one emergency coordinator.

Letter of Warning Issued April 18, 2005 as a result of June 2004 inspection findings.
June 29, 2004 Inspection (conducted by Rebecca Wenner):

2. KAR 28-31-4(g)(2) Failure to mark 32 accumulation containers with the start date

3. KAR 28-31-4(g)(3) Failure to label 32 containers with the words "hazardous waste"
4. KAR 28-31-4(g)(1)(A) Failure to close 5 hazardous waste containers
5. KAR 28-31-4(g)(1)(A) Failure to conduct weekly inspections of hazardous waste
6. KAR 28-31-4(J)(1)(A) Failure to close 8 satellite accumulations containers
7. KAR 28-31-4(j)(1)(B) Failure to label 8 satellite accumulation containers with the words "hazardous waste"
8. KAR 28-31-16 Failure to label 2 drums with the words "used oil"
9. KAR 28-31-4(g)/40 CFR 265 Subpart BB Failure to comply with Subpart BB (rescinded 11/15/04)

4.0 INSPECTION

I arrived at the facility at 12:30 PM on February 10, 2009. I identified myself to the receptionist, Kathy, and she explained that Mr. George Jones, the facility contact listed on the notification, was out of the office. I provided her with a copy of the regulation authorizing the inspection, and explained that I needed to conduct a walk-through. She attempted to contact a number of people by phone, in order to have someone accompany me, but to no avail. She explained that most of the facility's managers and team leaders were at a strategic planning meeting occurring in Kansas City. After approximately 45 minutes, she spoke to Tim Hoover, a maintenance technician who agreed to accompany me on a walk-through of the plant. I presented my credentials and discussed the purpose and procedures of the routine compliance inspection to Mr. Hoover, and he stated that he would help me as much as he could but that he did not have access to any records. Mr. Hoover stayed with me until Steve Johnson, Print Shop Team Leader, and later, Mae Sims, Human Resources Assistance, arrived. Mr. Johnson took over the inspection from Mr. Hoover approximately 1/2 hr after we had begun our walk-through. At that time, Mr. Hoover departed our company, and Mr. Johnson explained the facility operations and described the facility's waste streams. Throughout my walk-through of the facility, I noted a strong odor consistent with that of acetate solvent. On February 11, 2009, I returned to the facility to conduct record review. At this time, I met with George Jones.

Warehouse

No hazardous waste is generated in the warehouse. The company's empty drums are managed by A-1 Barrel, in Kansas City, KS. 12-16 empty drums a month are generated. Totes are reused through Barton Solvents and WRR.

Basement Storeroom and R&D Lab in Basement

No chemicals are used the (physical) testing lab and no wastes are generated or stored in the basement.

Printing Press Areas

Mr. Hoover stated that the facility has 5 active presses (and 3 that are semi active) including the V8 and V9 presses described below. 1 press has been mothballed. Waste flammable liquids (ink, and alcohol and acetate solvents: BARSOL 2155 and 2154) are generated from cleaning various components of the printing presses, and from thinning of inks.

Waste ink and solvent is also accumulated in <5-gallon drip pails located at each press. These collection buckets have holes cut in the lid and tubing running into the lid, to collect drips of waste ink and solvent occurring beneath presses. These waste buckets are placed underneath every press. All of the buckets observed were closed and marked with the words hazardous waste. See photo 9. Buckets are emptied into storage drums or totes when full. All three of the facility's hazardous waste storage areas are inspected on a weekly basis.

Solid hazardous wastes, in the form of ink and solvent contaminated gloves, paper wipes and miscellaneous debris, are generated at press areas. During the second day, Mr. Jones asked me if the company had to dispose of gloves, etc. as hazardous waste. I asked him if the company had made a determination, or if the inks had heavy metals in them, or if the company was using listed solvents. He said that no heavy metal inks were allowed, as the plant produced food-grade packaging. He said that solvents consisted of alcohols and acetates, with two primary BARSOL products in use, 2125 and 2154. He said that in the past, someone from KDHE, he thought, had told him that gloves could not be discarded as trash. I asked again about listed solvents and Mr. Jones said that the company purchased an used about 4 pounds of toluene a year, but that he did not expect it would be found on gloves. I explained that it was the company's option to conduct a waste determination of the solid wastes, either through process knowledge or representative sampling and analytical, and that if the company was able to demonstrate the wastes were non-hazardous, they were under no obligation to manage them as hazardous waste.

Wash-Up Area / FNK Press
Located near the "FNK press", reusable metal ink tubs are dipped in a 55-gallon drum of solvent used for cleaning. When the contents of this drum of solvent become too dirty to use, it is added to a waste tote in the adjacent area. See photo 6. Mr. Johnson stated that Raul Hernandez was the employee responsible for making a waste determination on this solvent drum. Mr. Johnson stated that it takes about 2 weeks for the facility to generate a drum of waste wash-up solvent. Mr. Hernandez's name did not appear on the list of employees filling jobs related to hazardous waste management.

Central Storage Area
In this area, I observed two totes marked hazardous waste, with accumulation start dates of 2/2/09 and 2/8/09, respectively. All of the facility's hazardous waste storage areas are inspected on a weekly basis.

This area is also used to store drums of solvent-saturated rags which are centrifuged by Walker Towel in a mobile processing truck. Waste solvent generated by the centrifuge process is returned to the Robbie plant and managed as hazardous waste. Once centrifuged, rags are taken by Walker towel for laundering. I observed 1 drum of rags in the central storage area; the drum was unmarked and had a lid lying on, but not affixed to, it. I did not cite a violation because at the time of the inspection, I was under the impression that the rags were exempt because they were being laundered. See photo 3. The issue of the unmarked saturated (pre-centrifuge) rag containers was submitted and referred to BWM for interpretation, via the NONC dated February 12, 2009.

V8 Press
The V8 press is piped to a reuse system that contains a series of three tanks—new solvent, washout solvent in use, and removed solvent. See photos 4 and 5. New and washout solvent is hard piped to the press, and is used to distribute and collect ink and solvent washout between color jobs. Removed solvent is collected in a tank which is hard piped to a waste tote in the area. One the second day of the inspection, Mr. Jones disclosed that the facility had experienced a small fire at the V8 press in 2008. The fire department was summoned, but no additional emergency response was required; the fire was brought under control by facility employees.

Ink Room Storage Area
This room, located in the NE corner of the production part of the building, is used for storing and mixing inks. Waste ink and solvent is also stored in this area. I observed two (2) 55-gallon metal drums of hazardous waste (one liquid waste and one solid waste, both hazardous) in storage at the time of the inspection. They were both marked and closed, with accumulation start dates of 2/3/09 and 2/20/09, respectively. All of the facility's hazardous waste storage areas are inspected on a weekly basis.

V9 press
This press has an automated solvent system which recirculates cleaning solvent a certain number of times and then hard pipes it to a waste tote. This waste is sent offsite as a hazardous waste to Barton Solvents, and then to WRR in Wisconsin, where it is reclaimed and sent back to Robbie as a product, "Reclaimed Solvent". I observed a tote of this reclaimed solvent at the V9 press on the day of the inspection. I also observed a partially full tote of waste solvent with an accumulation start date of February 2, 2009. All of the facility's hazardous waste storage areas are inspected on a weekly basis.

Satellite/Collection Area
In the SE corner of the production building, I observed 2 drums, one of liquid hazardous waste and one of solid hazardous waste, marked, and closed, with accumulation start dates of 2/10/09 and 2/4/09, respectively. All of the facility's hazardous waste storage areas are inspected on a weekly basis. The facility manages its satellite accumulation area like a storage area.

Maintenance Area
Located in this area is a 55-gallon drum of solvent used as a parts washer. Parts are dipped in the drum for cleaning. When this drum of solvent becomes too dirty to use, it is added to a waste tote in the central storage area.

Perimeter
No environmental concerns were observed around the perimeter of the buildings. No manufacturing or storage activities occur outside the building with the exception of loading docks on the north and south sides of the warehouse, and a fenced area containing a regenerative thermal oxidizer (RTO), installed for air emissions control. The RTO is on the northeast exterior wall of the manufacturing plant.

Document Review
On February 11, 2009, Mr. Jones provided me with the requested documents for review. I reviewed the following documents: manifests, land disposal restriction notices (LDRs), weekly hazardous waste storage area inspection logs, material safety data sheets (MSDS), notification, analytical results, waste profiles, annual and biennial reports, personnel training records, and contingency plan.

No violations were identified during the inspection of the following regulatory areas:

- General and Notification Requirements – No problems were noted. The notification was current and correct. Analytical results for the waste thinner/ink were on file. The company did not have a determination for waste lamps. See Violation 1.
- Pre-Transport Requirements - The treatment, storage, and disposal facility (TSDF) provides the generator with preprinted hazardous waste labels at the time of shipping.
- Storage Requirements
    - Emergency equipment was present and satisfactory. The fire extinguishers were last inspected in January 2009.
    - Weekly hazardous waste inspection logs were on file and satisfactory. I reviewed past logs beginning January 2006-present.
- Manifest Requirements - Manifests were on file and satisfactory. The last manifest reviewed was number WIK496396, dated March 6, 2006. Currently, the facility ships hazardous waste on a weekly basis.
- LDR Requirements - All LDR notices were satisfactory. The treatment, storage, and disposal facility (TSDF) provides the generator with an LDR notice to complete and return with each shipment.
- Hazardous Waste Reporting Requirements: Mr. Jones stated that Trinity Consultants does the company's reporting. Based on reports reviewed, the company generated 152 tons of hazardous waste in 2006; 165 tons of hazardous waste in 2007 and 119 tons in 2008.
    - Biennial Reports - Past biennial reports were on file and satisfactory.
    - Annual Reports and Fees - Past annual reports were on file and satisfactory. Annual monitoring fees had been paid for 2006-2009.
- Preparedness and Prevention Requirements - All requirements were satisfactory. I noted a concern that the company's spill kit was located in the ink room, at the opposite end of the building from the satellite and central storage areas.
- Personnel Training Requirements – See Violation 4 and Attachments .
- Contingency Plan Requirements - The contingency plan, last updated in 2006, was satisfactory. However, the plan describes using only drums for storage, not totes. I discussed this discrepancy with Mr. Jones.

5.0 DISCUSSION OF VIOLATIONS
Violation 1: Failure to determine if waste is hazardous waste, per K.A.R. 28-31-4(b), for fluorescent lamps described as currently being discarded in the trash. I asked Mr. Hoover what he did with spent fluorescent lamps, and he said that they just throw them in the trash. I asked

what kind of fluorescent lamps they used, and he said he thought they were T-11. Mr. Johnson later confirmed that spent lamps did go into the trash. Mr. Jones stated that someone had told him that the lamps were only regulated if they were accumulated or stored. I explained the universal waste regulations and told him that as a LQG, the company was required to make a determination on their lamps if they chose to dispose of them. I said I would require the company to provide a waste determination. He said that the company was embarking on a new sustainability program and that they were planning on recycling lamps in the near future. I did not observe waste lamps in the company's trash compactor.

Violation 2: Failure to mark storage container(s) of hazardous waste with the words "Hazardous Waste", per K.A.R. 28-31-4(g)(3), for one unmarked 55-gallon drum of solvent waste observed in the central storage area. The label on the drum of hazardous waste solvent was obscured by drips of ink. Inadvertently, I did not get a photo of this drum. I explained to Mr. Johnson that the drum needed to be re-labeled so that the words "hazardous waste" were visible. On the second day of the inspection, Mr. Jones confirmed that the drum had been marked as required, thus this Violation was corrected during the inspection.

Violation 3: Failure to close each satellite accumulation container of hazardous waste except when adding or removing waste, per K.A.R. 28-31-4(j) (1) (A), for one 55-gallon metal drum with an open funnel lid, observed in the satellite collection area. The drum of liquid hazardous waste had a red metal funnel affixed to the bung of the drum. The funnel's latch was not closed, and the lid of the funnel did not make a complete seal with the bowl of the funnel. I explained that in order for a container with a funnel to be considered closed, the lid or flap must fit tightly against the rim of the funnel to prevent the escape of vapors. Mr. Johnson said that the funnel lid was caked with dried ink and that's why it would not close. I explained the requirements for a closed container and he said they would probably just buy a new funnel. See photo 7.

Violation 4: Failure to adhere to requirements for training, per K.A.R. 28-31-4(g) (4)/40 CFR 265.16(d) (3). The Company's training documents did not include the following required elements:

a) A job title for each position related to hazardous waste management and the name of the employee filling each job was not provided. Neither Appendix B or D of the training plan included any names,
b) Not all job descriptions identify the type and amount of training to be given to employee(s). See Attachment 1.
c) Not all job descriptions described in training plan were produced during inspection (including job descriptions for George Jones or Raul Hernandez).
d) Not all job descriptions include a description of hazardous waste duties. See Attachment 1.
e) Company did not produce demonstration of annual training for George Jones or Dave Wagner.

Mr. Jones and I discussed the training requirements at length. He said that many of the documents used for RCRA compliance had been developed in cooperation with Trinity Consultants. I suggested that such template documents needed to be modified to include

facility-specfic information. I showed him the inspection checklist, and asked him to refer to the regulations and information contained on the BWM compact disk. He provided me with copies of job descriptions for employees managing hazardous waste, and also a copy of the company's training plan. These are found as Attachments 1 and 2. The company was directed to submit written demonstration that all training requirements have been met.

Concern 1: Spill Kit
The facility has a single spill kit identified in its contingency plan. This kit is located in the ink room. During the inspection, I observed that this spill kit is a significant distance from the other waste storage areas in the plant. I recommended that Robbie Manufacturing consider placing spill control equipment in those areas of the plant where large quantities of hazardous waste are being accumulated or stored. See photo 8.

Concern 2: Management of solvent-saturated rags, pre-centrifuge
On the day of the inspection, I observed multiple collection containers holding solvent-saturated rags. These were described as pending centrifuge processing by Walker Towel. The containers of rags observed were not marked with the words "hazardous waste". At the time of the inspection, the applicability of K.A.R. 28-31-4(g)(3) to the containers observe was unclear. This issue has been forwarded to the Bureau of Waste Management (BWM) for their review and interpretation. See photo 3.

Concern 3: Marking of waste solvent tank
On the day of the inspection, I observed a standing tank described by Mr. Johnson as a collection vessel for hazardous waste solvent. The tank was not marked with the words hazardous waste. Mr. Johnson said he thought it was usually marked "with something", but later Mr. Jones stated that the company did not consider the contents of the tank hazardous waste until the material was transferred to a storage tote. The area was addressed at length by the company in a letter to Rebecca Wenner dated September 6, 2004. The issue of the unmarked tank was submitted and referred to BWM for interpretation in the NONC dated February 12, 2009. See photos 4 and 5. Because, at the time of the inspection, the applicability of K.A.R. 28-31-4(g)(3) to this tank was unclear, the concern was forwarded to the Bureau of Waste Management (BWM) for their review and interpretation.

6.0 EXIT CONFERENCE
On February 11, 2009, I met with Mr. Jones to discuss the results of the inspection. I discussed the four violations cited and noted those that had been corrected during the inspection. I provided Mr. Jones with the Bureau of Waste Management (BWM) compact disc, and briefly explained some of the information available on the website. At the conclusion of the exit conference, I explained to Mr. Jones that I would send him a Notice of Non-Compliance (NONC) within 5 days. I informed Mr. Jones that additional violations could still be identified once the information gathered during the inspection had been reviewed. The NONC was sent on 2/12/09.

7.0 LIST OF HANDOUTS PROVIDED TO FACILITY
Compact Disk (CD) with all BWM handouts and examples

8.0 LIST OF ATTACHMENTS

Photo Log
Attachment 1 – job descriptions
Attachment 2 – Training Plan and documents with Appendices
Attachment 3 - Contingency Plan showing location of spill kit
Attachment 4 – notification for 20108 Mid-America building recently purchased by Robbie.

9.0 SIGNATURE OF AUTHOR/INSPECTOR

This report was prepared by:

Signature

Attachment # 1

Position Description **Robbie Manufacturihg**

Press Operator

FLSA Status: Non-exempt

JOB FUNCTION: To produce quality printed film in the most productive and efficient method.

RESPONSIBILITIES:

1. Operate and set up press to run in the most efficient manner.
2. Maintain legible and accurate daily production logs.
3. Interpret specifications from job envelope and insure finished rolls meet those specifications.
4. Maintain color control, clean, sharp print.
5. Report any problems with materials including film, ink, solvents to print shop team leader.
6. Minimize scrap.
7. Provide information and status of job being performed to the following shift of press.
8. Inspect equipment during work shift and report potential problems to maintenance and team leader.
9. To maintain an organized, clean department, including equipment, ink storage, cleanup room and work area at all times.
10. To work safe and follow procedures as stated in Safety Policy Manual. Report any potential safety hazards to your team leader.
11. All other duties as assigned.
12. Follow procedures as stated in the Good Manufacturing Practices manual and perform various cleaning and inspection duties to maintain AIB compliance as assigned. Report any potential violations of GMP policies to your team leader

EXPECTATIONS:

1. Perform responsibilities to expected outcomes.
2. Follow through on commitments in a complete and timely manner.
3. Participate actively in the management of the business through team involvement.
4. Identify and participate in learning activities that promote personal and professional growth.
5. Experiment with new processes and ideas to create innovation and continuous quality improvement.
6. Take risks and learn from resulting successes and mistakes.
7. Communicate openly, truthfully and compassionately with respect for individual differences.
8. Listen actively to understand before being understood and strive for win-win solutions.

REPORTING RELATIONSHIPS:

This position functions with the direct leadership of the Print Shop Team Leader.

WORKING CONDITIONS:

Normal production environment with regular exposure to hazards such as dust, noise, solvents, Will be trained in knowledge of hazardous waste and its disposal. Overtime may be required.

MINIMUM QUALIFICATIONS:

A high school diploma or equivalent, AND a minimum of one year of press operator experience is required; OR, an equivalent combination of education and/or experience.

KNOWLEDGE, SKILLS AND ABILITIES:

Able to function effectively in a fast paced, dynamic environment.
Excellent interpersonal skills.
Detail oriented.
Tactful, mature and able to get along with diverse personalities.
Ability to operate basic production equipment.

PHYSICAL REQUIREMENTS:

Must be able to stand for 8 hours per day.
Ability to repeatedly stoop, bend, and twist.
Repeated lifting while unloading printed rolls and palletizing customer orders.
Ability to repeatedly load/unload film rolls up to 60 lbs.

Print Shop Team Leader – All Shifts

11/12/04

FUNCTION: To plan and oversee implementation of quality brilliant printed products. To maintain a safe working environment and to deal with team members fairly and honestly.

RESPONSIBILITIES:

1. Review the daily press report looking for trends and unusual items.
2. Ensure every operator and assistant reads the daily press report and understands its importance.
3. Review the weekly press reports with the operators focusing on the expected outcomes.
4. Respond immediately to job approvals, no press should wait more than 5 minutes for you to get there.
5. Provide a quality printed product. Set standards and communicate and implement thorough training and coaching of personnel.
6. Set the standard for safety and insure our team members are performing in a safe manner.
7. Proactively review the monthly P&L for variances to budget and explain and rectify unfavorable trends.
8. Select, hire, and oversee training of individuals required to meet necessary production.
9. Submit thorough and complete budgets annually, in an attempt to forecast financial requirements for the upcoming year.
10. Ensure ink room procedures are being established and followed to deliver press ready inks to the presses and to ensure quality, consistent color is being delivered to our customers.
11. Provide leadership to the 1st, 2nd and 3rd shift team leads.
12. Follow procedures as stated in the Good Manufacturing Practices manual and perform various cleaning and inspection duties to maintain AIB compliance as assigned. Report any potential violations of GMP policies to your team leader

EXPECTATIONS:

1. Perform responsibilities to expected outcomes.
2. Follow through on commitments in a complete and timely manner.
3. Participate actively in the management of the business through team involvement.
4. Identify and participate in learning activities that promote personal and professional growth.
5. Experiment with new processes and ideas to create innovation and continuous quality improvement.
6. Take risks and learn from resulting successes and mistakes.
7. Communicate openly, truthfully and compassionately with respect for individual differences.
8. Listen actively to understand before being understood and strive for win-win solutions.
9. Coach/develop team members and provide leadership that result in continuous improvement.
10. Develop internal and external resources resulting in improved customer relations, product development, order fulfillment, value added information, quality and cost reduction.
11. Achieves high impact results in product innovation, quality improvement and/or costs reduction.

REPORTING RELATIONSHIPS:

This position functions with the direct leadership of the Chief Operations Officer.

WORKING CONDITIONS:

Production environment with exposure to identified hazards such as dust, noise, etc. Overtime will be required.

MINIMUM QUALIFICATIONS:

A Bachelor's degree in Business, or related field, AND a minimum of three years of solid leadership experience in a manufacturing environment with exposure to all aspects of leadership (training, development, coaching, budgeting, etc.) is required; OR, an equivalent combination of education and/or experience.

KNOWLEDGE, SKILLS AND ABILITIES:

Able to exemplify professional behavior in all aspects of their position.
Demonstrated leadership skills.
Able to function effectively in a fast paced, dynamic environment.
Excellent interpersonal skills.

Ink Technician
4/1/07

FUNCTION: To supply color correct inks in a timely and quality manner to the print shop.

RESPONSIBILITIES:
1. Supply required inks (color & system) to presses @ Delta E of 1 or less.
2. Manage and maintain color control program utilizing the 939 and 530 X-rite color measurement instruments, in the ink lab and on pressroom floor.
3. Understand color theory and be able to effectively communicate color and the tolerancing used.
4. Understand and assist troubleshooting flexo printing at press.
5. Utilize TCM & Pre Pro system to correlate formulation strength with press tooling when staging ink at presses.
6. Maintain, and utilize work off inks when practical while maintaining Delta E of 1 or less.
7. Develop new color formulations as required by customer specifications while considering economical use of base combinations.
8. Prepare customer draw downs as requested by customer or CSR.
9. Maintain ink dispensing equipment.
10. Maintain ink & solvent inventory daily. Submit appropriate order when necessary to ensure adequate supply with minimal inventory cost for the company. (Day Shift Only)
11. Inspect all anilox rolls utilizing anilox roll scope, record data after cleaning in the anilox roll data base. Also take all cleaned rolls back to press and update anilox roll chart, daily.
12. Forklift operation certification is required.
13. Hazardous Waste handling and procedural certification required.
14. Keep work area clean and safe.
15. Follow procedures as stated in the Good Manufacturing Practices manual and perform various cleaning and inspection duties to maintain AIB compliance as assigned. Report any potential violations of GMP policies to your team leader

EXPECTATIONS:
1. Perform responsibilities to expected outcomes.
2. Follow through on commitments in a complete and timely manner.
3. Participate actively in the management of the business through team involvement.
4. Identify and participate in learning activities that promote personal and professional growth.
5. Experiment with new processes and ideas to create innovation and continuous quality improvement.
6. Take risks and learn from resulting successes and mistakes.
7. Communicate openly, truthfully and compassionately with respect for individual differences.
8. Listen actively to understand before being understood and strive for win-win solutions
9. Safely Operate EE rated Forklift. (average operation time frame 15 minutes, Three times per week)
10. Develop internal resources resulting in improved relations, product development, order fulfillment, value added information, quality and cost reduction.

REPORTING RELATIONSHIPS:
This position functions under the direct leadership of the Inkroom Team Lead and the Print shop shift team lead.

WORKING CONDITIONS:
Normal production environment with regular exposure to hazards such as solvents, dust, noise, etc. Some overtime will typically be required. Extended CRT viewing.

MINIMUM QUALIFICATIONS:
A high school diploma or equivalent, and experience in color control and ink formulation with exposure to all aspects of flexographic printing, training, development, coaching, etc. is required; or an equivalent combination of education and/or experience.

KNOWLEDGE, SKILLS AND ABILITIES:
Able to exemplify professional behavior in all aspects of their position.
Flexo press trouble shooting skills.
Able to function effectively in a fast paced, dynamic environment.
Excellent interpersonal skills.
Strong organizational skills.
Detail oriented.
Tactful, mature and able to get along with diverse personalities.
Ability to operate basic office equipment such as a phone, fax, copier, and printers.
Computer literate with a strong knowledge of software such as Microsoft Office.

Utility Person

09/30/98

JOB FUNCTION: To assist in the press changeover process and minimize time required to perform a press changeover.

RESPONSIBILITIES:

1. Ensure mounted cylinders are available and at press prior to the start of a changeover.
2. Assist in ensuring appropriate ink supply is available to press at changeover.
3. Assist mounter/proofer with preparing appropriate cylinders and gears for print orders.
4. Ensure appropriate level of inventory is available at press.
5. Maintain solvent distillation process included recycling waste ink and storage of clean solvent, operation of solvent recycler and supplies.
6. Assist in operating presses as required.
7. Assist in training new print shop hires.
8. Maintain an organized, clean work area at all times.
9. Work safe and follow procedures as stated in Safety Policy Manual. Report any potential safety hazards to your team leader.
10. Work in clean up room and maintain wash tank.
11. Prepare waste ink and solvent drums for disposition.
12. Return properly labeled ink kits to ink room or staging area.
13. Follow procedures as stated in the Good Manufacturing Practices manual and perform various cleaning and inspection duties to maintain AIB compliance as assigned. Report any potential violations of GMP policies to your team leader

EXPECTATIONS:

1. Perform responsibilities to expected outcomes.
2. Follow through on commitments in a complete and timely manner.
3. Participate actively in the management of the business through team involvement.
4. Identify and participate in learning activities that promote personal and professional growth.
5. Experiment with new processes and ideas to create innovation and continuous quality improvement.
6. Take risks and learn from resulting successes and mistakes.
7. Communicate openly, truthfully and compassionately with respect for individual differences.
8. Listen actively to understand before being understood and strive for win-win solutions.

REPORTING RELATIONSHIPS:

This position functions with the direct leadership of the Print Shop Team Leader.

WORKING CONDITIONS:

Normal production environment with regular exposure to hazards such as dust, noise, solvents, etc. Will be trained in knowledge of hazardous waste and its disposal. Overtime may be required.

MINIMUM QUALIFICATIONS:

A high school diploma or equivalent, AND a minimum of one year of press operator experience is required; OR, an equivalent combination of education and/or experience.

KNOWLEDGE, SKILLS AND ABILITIES:

Able to function effectively in a fast paced, dynamic environment.
Excellent interpersonal skills.
Detail oriented.
Able to work efficiently and effectively w/o direct supervision
Tactful, mature and able to get along with diverse personalities.
Ability to operate basic production equipment.
Computer literate with a knowledge of software such as Microsoft Office.
Must be able to stand for 8 hours per day.

Position Description **Robbie Manufacturing**

Assistant Press Operator

FLSA Status: Non-exempt

JOB FUNCTION: To assist in the production of quality printed film in the safest, most productive, and efficient method.

RESPONSIBILITIES:

1. Assist press operator to set up press run in the most efficient manner.
2. Assist press operator and learn to operate press to be as productive and efficient as possible.
3. Maintain inks, solvent, film and cores in adequate order to perform requirements of job being produced.
4. Must be able to read and interpret specifications on job envelope and help ensure specifications are met.
5. Maintain color control; assist in keeping clean, sharp print.
6. Inform press operator of problems with material.
7. To maintain an organized, clean department, including equipment, ink storage, cleanup room and work area at all times.
8. Provide information and status of job being performed to the following shift on press.
9. To read and follow procedures detailed in the Assistant Press Operator Training Manual.
10. To work safe and follow procedures as stated in Safety Manual. Report any potential safety hazards to your team leader.
11. All other duties as assigned.
12. Follow procedures as stated in the Good Manufacturing Practices manual and perform various cleaning and inspection duties to maintain AIB compliance as assigned. Report any potential violations of GMP policies to your team leader

EXPECTATIONS:

1. Perform responsibilities to expected outcomes.
2. Follow through on commitments in a complete and timely manner.
3. Participate actively in the management of the business through team involvement.
4. Identify and participate in learning activities that promote personal and professional growth.
5. Experiment with new processes and ideas to create innovation and continuous quality improvement.
6. Take risks and learn from resulting successes and mistakes.
7. Communicate openly, truthfully and compassionately with respect for individual differences.
8. Listen actively to understand before being understood and strive for win-win solutions.

REPORTING RELATIONSHIPS:

This position reports directly to the assigned press operator and to the Print Shop Shift Leader.

WORKING CONDITIONS:

Normal production environment with regular exposure to hazards suxh as dust, solvents etc. Will be trained in knowledge of hazardous waste and its diposal. Overtime may be required. Repeated lifting while palletizing customer orders.

MINIMUM QUALIFICATIONS:

A high school diploma or equivalent. Prior production or manufacturing experience is preferred.

KNOWLEDGE, SKILLS AND ABILITIES:

1) Must have the ability to read and comprehend the procedures detailed in the Assistant Press Operator Training Manual and the Safety Manual.
2) Must be able to perform basic arithmetic functions (addition, subtraction, multiplication, and division, and manipulate fractions) related to press operation and ink inventory.
3) Must be able to read and use a tape measure.

Attachment # 2

HAZARDOUS WASTE TRAINING PROGRAM
ROBBIE MANUFACTURING, INC. ▪ LENEXA FACILITY

Prepared by:

George Jones ▪ Manufacturing Projects

ROBBIE MANUFACTURING, INC.
10810 Mid-America Avenue
Lenexa, Kansas 66219

May 2003
Revised: November 11, 2004
Revised July 18, 2006
Revised April19, 2007
Reviewed April29, 2008

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The Resource Conservation and Recovery Act (RCRA) Emergency/Contingency Plan (Plan) is required by federal regulation for facilities that generate or accumulate greater than 2,200 pounds of hazardous waste per month as outlined in Title 40 Code of Federal Regulations (40 CFR) Part 265, Subpart D.

In accordance with 40 CFR Part 265.16, facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part.

The following is a brief review of the facility description.

1.1 FACILITY DESCRIPTION

Company Name:	Robbie Manufacturing, Inc.
Facility Address:	10810 Mid-America Avenue, Lenexa, Kansas 66219
Telephone:	913-492-3400
FAX:	913-492-1543
EPA ID Number:	KSD 054080148

The Robbie Manufacturing, Inc. (Robbie) Lenexa facility is a printing manufacturing plant. The plant employs approximately 150 people, depending on business activity. Robbie operates 24-hours per day, seven days per week. The plant generates and/or accumulations more than 2,200 pounds of hazardous waste per month; therefore, according to the Kansas regulations, Robbie is classified as a Kansas EPA Generator. The facility is located in the Lenexa Industrial Park, just west of Interstate (I)-35, and south of I-435. J.C. Penney's distribution warehouse is located nearby.

Waste flammable liquid with a flash point less than 140 degrees Fahrenheit (F) is classified as hazardous waste. This waste represents the majority of the hazardous waste generated on-site and addressed in this Plan. It is generated from cleaning various components of the printing presses and is accumulated in a 55-gallon steel satellite drum. When each satellite accumulation drum is filled, the drum is sealed and transported to the hazardous waste storage area within three days. Within 90 days of filling the drums, the full drums are transported off-site for disposal. The details for the hazardous waste handling and disposal procedures are located in the Compliance Administrator's office.

2.1 WASTE DEFINITIONS

A waste is a hazardous waste if it exhibits any of the following characteristics

1) Flammable or Ignitability
   a. A characteristic for flammable or ignitability is if the chemical exhibits a flash point below 140 degrees Fahrenheit (F).
2) Reactive, characteristics include the following;
   a. If the chemical reacts with air or water,
   b. If the chemical reacts spontaneously,
   c. If the chemical will cause a fire or explosion, or
   d. If the chemical will release cyanides or sulfides
3) Corrosive, characteristics include the following;
   a. If the chemical has pH less than or equal to 2.0 or equal to or greater than 12.5, or
   b. If the chemical corrodes steel at ¼ inch or more per year.
4) Toxicity characteristics include the following;
   a. If the chemical contains the following metal above the regulatory limits using Toxicity Characteristic Leaching Procedure (TCLP) test. Typical metals include Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, or Silver. A more complete list is located in 40 CFR Part 261.24.
5) Listed hazardous waste, the listed wastes include;
   a. The F List is for Hazardous Wastes (HW) from non-specific sources. F listed wastes include F001, F002, etc. A more complete list is located in 40 CFR Part 261.31.
   b. The K list is for HW from specific sources. A complete list is located in 40 CFR Part 261.32.
   c. The P List is for HW for discarded acutely toxic commercial chemical products. A complete list is located in 40 CFR Part 261.33.
   d. The U List is for HW for discarded toxic commercial chemical products. A complete list is located in 40 CFR Part 261.34.

2.2 HAZARDOUS WASTES AT THE ROBBIE FACILITY

Robbie generates hazardous waste solvent, which is collected during the cleaning of equipment. The waste solvent exhibits a characteristic for flammable or ignitability because the solvent flash point is below 140 degrees F.

During the past year 20__, Robbie generated waste ink, which exhibits a characteristic for flammable or ignitability because the solvent flash point was less than 140 degrees F and a listed waste that carries the F003 waste code.

2.3 USED OIL AND USED OIL FILTERS

Robbie generates used oil and used oil filters so Robbie provides training for the management of used oil. All used oil drums are to be closed when not in use. The drums are to be labeled "Used Oil".

The hazardous waste coordinator will review the information below with all employees who place waste in satellite or storage containers located within the facility. This training will be performed annually, and records of the training will be kept for 3 years.

3.1 CONTAINER MARKING/LABELING

According to 40 CFR 262.31, Robbie will label each container in accordance with the applicable Department of Transportation (DOT) regulations on hazardous materials under 49 CFR Part 172.

The drum label, also known as a drum marker, states in lettering "HAZARDOUS WASTE". This label is five inches by 8.5 inches with a white background. The following information must be filled in once this label is attached to the drum or container in the satellite area:

Generator Information

Name of the company:	Robbie Manufacturing, Inc.
Address:	10810 Mid-America Avenue
City/State/Zip:	Lenexa, Kansas 66219
ID No.:	KSD 054080148
Waste No.:	D001 (only if Robbie accumulates a waste with flammable or ignitability less than 140 degrees F)

Leave the following information blank, if the drum is used in the satellite accumulation area
Start Date of Accumulation: The date is not required until the drum is full and is ready to be sent to the 90-day area.
Manifest Number: The manifest number is filled in as soon as the drum is ready for off-site shipment.
Robbie personnel are to report when they find any container missing the "Hazardous Waste" label to the emergency coordinator.

3.2 WASTE SEGREGATION

According to 40 CFR 265.17, Robbie will take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction, including but not limited to: Open flame, smoking, cutting and welding, hot surfaces, frictional heat, sparks, (static, electrical, or mechanical), spontaneous ignition, and radiant heat. While ignition or reactive waste is being handled, Robbie must confine smoking and open flame to specially designated locations.

3.3 STORAGE CONTAINERS

(storage container room)

Management of 55-gallon and 300 gallon Storage Container at Presses:

- **Robbie will only fill one container per waste stream, up to 55 gallons with hazardous waste in the storage container room,**
    - Please note if acute waste is generated, the quantity is one quart rather than 55 gallons.
- **Each storage container must be clearly labeled "Hazardous Waste"**
- **Each container will be in good condition**
- **Each container will have adequate strength and integrity to contain the waste**
- **Each container will not contain deep creases or dents**
- **Each container not be rusted or corroded**
- **Each storage container must be dated with is accumulation start date when waste is first put into the container.**
- **Each storage container will be kept closed except when adding or removing waste.**
- **Each storage container must have the label and accumulation start date clearly visible**
- **Each storage container will be shipped off site in less than 90-days**
- **Weekly inspections will be conducted of the storage area**
- **A full container must be closed and removed from the storage accumulation area to the 90-day storage area within 3 days. A closed container means that the lid must be tight and bolted, and the bungs on the lid must be tight. It is the users responsibility to keep containers closed and sealed,**

3.4 SATELLITE CONTAINERS

1) Management of Satellite Containers at the Printing Presses

Each container collecting ink drippings from the deck pan will be identified as a satellite container.

Containers:

- **The size of the containers at each press will not exceed 5 gallon pails**
- **Each container will be in good condition**
- **Each container will have adequate strength and integrity to contain the waste**
- **Each container will not contain deep creases or dents**
- **Each container not be rusted or corroded**
- **Each container will be labeled "Hazardous Waste"**

Management of the 5-gallon Satellite Container:

- **Each satellite container will be closed except when adding or removing waste (deck pans continually drip ink into the satellite container(s) during the printing process therefore will only be closed when the press is not in operation)**
    - **Closed satellite containers must use a cover or lid designed to close the container**
    - **Satellite containers collecting waste containing volatile constituents must have lids with gaskets**
- **Satellite containers collecting liquid waste should be secured or protected when possible.**
- **Each satellite container will be located at the point of generation and under the control of the operator**

- **Each operator will be trained on the hazardous waste regulations**
- **Each operator will be trained to handle the satellite container and to pour the contents into the storage container**
- **Each satellite container will be dumped into the storage container when full**

3.5 90 Day Storage Area

(area behind V8 press)

Robbie will perform the following for solvent storage in the 90-day storage areas:

1) Secure the 90 day storage such as with a locked entrance,
2) Designate the 90 day storage area as a waste area,
3) The maximum time for any full drum of hazardous waste setting within on site is 90 days, other than the time allowed to fill each satellite accumulation container.

3.6 Weekly Inspections 90 Day Storage Area

The 90-day storage area inspections will include the following:

1) **Check the security of the 90 day storage area,**
2) **Check for the presents of the hazardous waste label on each the drum,**
3) **Check for the accumulation start date on each date,**
4) **Check aisle spacing between each container,**
5) **Check for open containers,**
6) **Check the condition of each container for leaks or spills,**
7) **Check the operation of the nearby telephone,**
8) **File the inspection report for three years, and**
9) **The inspection record will include the date and time of the inspection, signature of the inspector, a notation of the observations made, and the date and time of any repairs or other remedial actions.**

The 90-day storage area inspection sheet is located to Appendix A.

3.7 Safety Precautions

Robbie employees will exercise care in handling waste at the facility and will wear the appropriate personnel protection equipment (PPE). After completing the waste handling tasks, employees will wash their hands and any other body parts that may have come into contact with the waste.

3.8 MANIFESTING

Robbie manifests all shipments of hazardous waste from the Lenexa facility. Robbie will work with the transporting company in preparing the proper manifest with the most accurate information prior to shipment. Employees who have had "Hazardous Waste" training are authorized to sign the manifests. Manifesting instructions are located in Section 4.5 of this manual.

3.9 LAND BAN RULE

Robbie includes a Land Ban Restriction (LDR) form with all hazardous waste shipments involving waste solvent. Waste solvents are forbidden from direct municipal landfill disposal without special treatment. LDR instructions are located in Section 4.6 of this manual. Solvents and any related waste solvent soaked waste streams such as rags and distillation bottoms must be either recycled, re-used, fuel blended or incinerated.

3.10 WASTE MINIMIZATION PROGRAM

The plant certifies there is a program to minimize hazardous waste with the signing of each manifest. Robbie works to minimize spills, leaks, and releases of chemicals and uses solvent recycling companies to minimize hazardous waste generation.

3.11 EMERGENCY RESPONSE

Robbie employees will follow the emergency response procedures as outlined in the contingency plan. All employees are to notify the emergency coordinator immediately in the event of a spill, fire, and/or explosion. Employees will provide the emergency coordinator their name, the date and time of the report, type and quantity of the spill event, and any injuries.

3.12 MSDS'S

The Material Safety Data Sheets (MSDS) for each solvent used in process and cleanup of the equipment are located next to the thermal oxidizer control panel. These solvents are similar to the waste solvent placed in the satellite drums. Employees are to review the description of the material, health care information, and spill response and disposal information, annually.

3.13 RCRA CONTINGENCY PLAN

The emergency coordinator will briefly review the Plan with all employees who place hazardous waste into the satellite drums. The employees are asked to read the Plan when they find time during the workday. The information reviewed in the plan includes:

1) **The location of the Plan**
2) **Table of contents**
3) **Facility Description**
4) **Type of hazardous waste generated on site**
5) **The emergency coordinators**

6) **Agency response contacts**
7) **Emergency procedures, such as evacuation routes and signals**
8) **Locations of eyewash and first aid stations per the map.**

According to 40 CFR 265.16, facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. The Hazardous Waste Coordinator (HWC) is the person responsible for managing the hazardous waste program at Robbie. Records of the HWC training will be kept on file for 3 years.

4.1 HAZARDOUS WASTE COORDINATOR TRAINING

The HWC is trained in hazardous waste management procedures, and teaches facility personnel hazardous waste management procedures as outlined in Section 3 of this manual, including Plan implementation. At a minimum, this program is designed to ensure facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems. The emergency procedures include the following:

1) Procedures for using, inspecting, repairing, and replacing facility emergency equipment,
2) Procedures for communication and alarm systems,
3) Procedures for response to fire and explosions,
4) Procedures for spill response, and
5) Procedures for the shutdown of operations at the facility.

4.2 FACILITY PERSONNEL TRAINING

The HWC will ensure that facility personnel successfully complete the program within six months after the date of their assignment in this program. Employees must not work with HW in unsupervised positions until they have completed the training requirements.

4.3 FACILITY PERSONNEL ANNUAL REVIEW

The HWC will ensure that facility personnel part takes in an annual review of the initial training as outlined in Section 3 of this manual.

4.4 RECORDS

The HWC will maintain the following documents and records at Robbie:

1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job (Appendix B).
2) A written job description for each position related to hazardous waste management (Appendix C).
3) A written description of the type and amount of training given the hazardous waste coordinator (Appendix D).

4) Records that document that the training or job experience required has been given to, and completed by facility personnel.
5) Training records must be kept for at least three years from the date the employee last worked at the facility.

4.5 Manifesting Shipments of Waste

Since Robbie is the generator of hazardous waste, it is Robbie's responsibility to acquire and prepare the proper manifest for shipment to the consignment state. Typically, Robbie allows the hazardous waste vendor to prepare the shipment; including preparing the proper manifest for shipment though Robbie must review the manifest for completion and accuracy. It is Robbie's responsibility to acquire the proper placards for shipment to the consignment state. Typically, Robbie works with the HW vendor, the HW sends the proper placards with the transporter though Robbie must review the placards for completion and accuracy. Robbie personnel will then sign and date the certification statement for each manifested waste shipment leaving the facility. Manifesting guidance is located in Appendix E of this manual.

The manifest consists of a number of copies which provide the generator, each transporter, and the owner or operator of the designated facility with one copy each for their records and another copy to be returned to Robbie. Some states require the generator to submit a copy the consignment state agency, such as shipments to Wisconsin.

Upon discovery of a significant discrepancy which cannot be resolved within 15 days after the initial transporter receives the waste, Robbie must immediately submit to the KDHE a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest at issue.

If Robbie does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter, Robbie must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste. Robbie must submit an Exception Report to the KDHE if Robbie has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report must include:

- A legible copy of the manifest for which Robbie does not have confirmation of delivery,
- A cover letter signed by Robbie explaining the efforts taken to locate the hazardous waste and the results of those efforts.

The HWC is responsible for reviewing the manifests annually for completion and accuracy. Any discrepancies in paperwork will be reviewed with the appropriate personnel.

4.6 LDR Forms

The LDR form is also known as a Land Disposal Notification and Certification Form or Land Ban Restriction Form. This form is necessary because waste solvent is banned from entering a municipal or HW landfill.

Robbie reviews the manifested shipments of generated waste for the inclusion of the LDR forms. LDR form guidance is located in Appendix F of this manual.

5.1 STORAGE OF SOLVENC CONTAMINATED RAGS

Containers of solvent contaminated rags/whips must be labeled "Hazardous Solvent Contaminated Rags" or similar wording
Rag containers are provided at each press and must be emptied daily into drums provided.

Drums containing solvent contaminated rags must be covered except to add or remove rags.

APPENDIX A

WEEKLY INSPECTION SHEETS

Appendix B

JOB TITLES & NAMES

JOB TITLES & NAMES

Job Title - Print Shop Team Leader
Names of the employees:

Job Title - Ink Technician
Names of the employees:

Job Title - Changeover Coordinator:
Names of the employees:

Assistant Press Operator:
Names of the employees:

Press Operator:
Names of the employees:

APPENDIX C

WRITTEN JOB DESCRIPIONS

WRITTEN JOB DESCRIPTIONS

The job descriptions for the Print Shop Team Leader, Ink Technician, Changeover Coordinator, Assistant Press Operator, Press Operator, Primary Emergency Coordinators, and the Secondary Emergency Coordinator are on file with the Human Resource Department.

APPENDIX D

TYPE AND AMOUNT OF TRAINING

TYPE AND AMOUNT OF TRAINING

The Print Shop Team Leader, Ink Technician, Changeover Coordinator, Assistant Press Operator, Press Operator, and the Primary Emergency Coordinators will receive the annual review training outlined in Section 3 of this manual. Any new employee will receive the same training outlined in Section 3 of this manual.

Trinity, will train the Secondary Emergency and the Hazardous Waste Coordinator. The training includes the information outlined in this manual.

APPENDIX E

MANIFESTING GUIDANCE

MANIFESTING GUIDANCE

The following is a step-by-step guidance document on how to review or prepare a hazardous waste manifest. Currently, Robbie is shipping waste to the State of Wisconsin so the guidance is for Wisconsin manifests, which has a state specific form. If the vendor cannot supply additional Wisconsin forms, Robbie can order forms from:

STANDARD REGISTER
ATTN: CENTRAL RELEASE
P.O. BOX 1167
DAYTON, OHIO 45401-1167

Allow two weeks for delivery time from the day the order is mailed to Standard Register. The cost for the forms is approximately $10.00 per pack of 25 forms. Telephone inquires can be made to "Delivery Information", (717) 697-1113.

Please refer to manifest number WIK292177 as the manifest used in this guidance document. Each Wisconsin manifest has 20 numbered and eight lettered boxes requiring information. A brief description will be included with each numbered and lettered box, starting with box number 1:

1. Generator's USEPA ID No.:	KSD054081048 (Robbie's EPA ID No., see page 2 of this manual.
Manifest Document No.:	This is a five-digit number, i.e. if we have one load shipped, April 28, 2005 then we assign the following manifest number: 05017 ▲ The first two digits are 05, which represent the year ▲ The third digit is 0 which is used as a filler ▲ The fourth and fifth digits represents the week of the year
2. Page 1 of __:	Normally we would enter a 1. More than one page is required if Robbie is shipping more than 4 different wastes and/or if they are using more than two shippers. This manifest was only page 1 of 1.
3. Generator's Name & Mailing Address:	Robbie Manufacturing, Inc. 10810 Mid-America Ave. Lenexa, KS 66061 Attn. George Jones
4. Generator's Phone:	(913) 492-3400
5. Transporter 1 Company Name:	Barton Solvents
6. US EPA ID No.	KSD984969236 (Barton Solvents EPA ID No.)
7. Transporter 2 Company Name:	Fill in name. Only if a second transporter is used.
8. US EPA ID No.:	Fill in number for transporter 2
9. Designated Facility Name & Site Address:	WPR Environmental Service 5200 State Road 92 Eau Claire, WI 54701
10. US EPA ID No.	WID990529475
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	▲ **RQ Hazardous Waste, Solid, n.o.s., 9, NA3077, III (D007)** – The DOT proper name is broken down (in bold) as follows; ▲ **RQ** – 10 pounds, table 172.101, page 247 for D007. The waste in the drum weighs more than 10 pounds. ▲ **Hazardous Waste, Solid, n.o.s.** – table 172-101, page 160. ▲ **9**-Hazardous Class – table 172-101, page 160. ▲ **NA3077** – Identification number, table 172.101, page 160. ▲ **III** – Packing Group (PG), table 172.101, page 160. ▲ **(D007)** – Additional information to better explain the specific hazard.
12. Containers No. & Type	001 for one container and DM for drum. See back of manifest for container codes if we are shipping other than in drums. Each space must be filled in, that is, why we use zeros. If we look at item 11a in manifest WI K391411, it lists 005 as the no. of containers.
13. Total Quantity	02000, is the total pounds of waste We use total pounds shipping out. If we look at item 11a on manifestWI K391411, it lists 02000 as the total quantity, which is 5 drums times 400pounds for 2000 pounds.
14. Unit Wt/Vol.:	P for pounds. If we ship in hopper, enter Y for cubic yards.

15. Special Handling Instructions & Additional Information:	We must note "EMERGENCY CONTACT NUMBER We use WRR Emergency Response 800-669-4162. Check Vehicle Lic. Plate # completed **On manifest (Emergency response code) information.** Use this space to briefly explain any corrections, which we can not clearly see in items 1 through 11, 15 through 19.
16. Generators Certification:	▲ Printed/Typed Name and Position Title: Rex Barker, Receiving George Jones, Project Manufacturer These are only the individuals authorized to sign this manifest for Robbie Manufacturing, Inc. ▲ Signature The one, who prints their name, must sign this manifest. ▲ Date Must be the exact date when the waste leaves the plant. If manifest comes to plant with a pre-printed date and it is incorrect, run a single line through the date and enter proper date the space above.
17. Transporter 1 Acknowledgement of Receipt of Materials	▲ Printed/Typed Name and Position title The driver's name may be pre-printed, if not, the truck driver must print his name and title in this space. ▲ Signature The one, who prints their name, must sign the manifest. ▲ Date Must be the exact date when the waste leaves the plant. If manifest comes to plant with a pre-printed date and it is incorrect, run a single line through date and enter proper date in th space above.
18. Transporter 2	Only fill in if you has knowledge if a second transporter will be used. Printed/Typed Name (No title needed) – This information will be filled out, sometime after the shipment leaves the plant
19. Discrepancy Indication Space	Use this space to briefly explain the corrections to items 12, 13 & 14.
20. Facility Owner or Operator:	Certification of receipt of hazardous materials covered by the manifest except as noted in Item 19. The TSD facility is to fill out, sign, and date receipt and mail back to Robbie Manufacturing, Inc.

Letter items as follows:

A) State Manifest Document Number: This number is a state assigned number pre-printed on the manifest. Wisconsin state manifest numbers begin with "WI", Illinois begins with "IL", and Pennsylvania begin "PAE". For our example we are shipping this waste to Wisconsin, reference manifest number WIK292177 waste was shipped on November 17, 1998.

B) State Generator's ID Number: May be blank

C) State Transporter's ID number: This is the transporter listed as item number 5 on the manifest.

D) Transporter's Phone number: For the transporter listed in section C

E) If second transporter is used, the transporter needs to fill out their ID number.

F) This section requires the second transporter's Phone number, too.

G) State Facility's ID number: This is the facility receiving our waste, listed as items number 9 on the manifest.

H) Facility's Phone number: The phone number is for the facility number listed in Section G.

I) Waste No.: Use the EPA Hazardous Waste code which best explains this waste. On manifest, WIK292177, item 11a, we use.

J) Additional Descriptions for Materials Listed Above: Normally, this may be blank but for this manifest, D001Profile # 2001110186 is listed

K) Handling Codes for Wastes Listed Above. Normally, this may be blank but for this manifest, D001Profile # 2001110186 is listed

The following step is a must do: As soon as the shipment leaves the plant, a copy of the manifest is to be certified mailed to the receiving state, only if this is a receiving state requirement.

Wisconsin requires a mailed copy of the manifest, see copy 3 of the manifest that states "Facility send to Wisconsin DNR". A copy of this manifest must be mailed within 10 days of the original shipment date.

LDR FORM GUIDANCE

The LDR form is also known as a Land Disposal Notification and Certification Form or Land Ban Restriction Form. This form is required because waste solvent is on a waste list, which is banned from entering a municipal landfill.

This additional form must be attached with the manifest. The hazardous waste vendor handling the disposal of Robbie's waste solvent will supply this form. The following information should be filled out each time a LDR is required:

1) Generator Name: Robbie Manufacturing, Inc
2) Manifest Number: WIK292177 (Seen Wisconsin Manifest dated 4/28/05)
3) Generator's Manifest Document #: 05017 (See Wisconsin Manifest dated 4/28/05)
4) Profile information: Normally this includes a profile number, waste type (non-wastewater), waste code (D001), and description (ignitability).
5) Signature: Authorized Robbie employee
6) Date signed by the authorized Robbie employee

Attachment # 3

RCRA EMERGENCY/CONTINGENCY PLAN
ROBBIE MANUFACTURING, INC. ▪ LENEXA FACILITY

Prepared by:

George Jones ▪ Manufacturing Projects

ROBBIE MANUFACTURING, INC.
10810 Mid-America Avenue
Lenexa, Kansas 66219

April 2003

Project 031701.0040

Reviewed and changed August 2004
Reviewed July 2005
Reviewed and changed July 2006
Reviewed August 2007
Reviewed August 2008

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The Resource Conservation and Recovery Act (RCRA) Emergency/Contingency Plan (Plan) is required by federal regulation for facilities that generate or accumulate greater than 2,200 pounds of hazardous waste per month as outlined in Title 40 CFR Part 265, Subpart D.

The purpose of the Plan is to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water.

The provisions of the Plan must be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste components, which could threaten human health or the environment.

The Primary Emergency Plan Coordinator will be responsible for implementing the initial responses required to minimize hazards to human health and the environment, and will report incidents to the appropriate state and federal agencies.

A current copy of this Plan and any subsequent revisions must be provided to the Lenexa Police and Fire departments, Menorah Medical Center, and the Johnson County Emergency Management Office. Copies of the Plan are mailed to each agency using the United States Postal Service (USPS) Certified Mail program, which mails back to Robbie a signed and dated receipt of delivery.

1.1 FACILITY DESCRIPTION

Company Name:.....Robbie Manufacturing, Inc.
Facility Address:.....10810 Mid-America Avenue, Lenexa, Kansas 66219
Telephone: 913-492-3400
FAX: 913-492-1543

EPA ID Number: .....KSD 054080148

The Robbie Manufacturing, Inc. (Robbie) Lenexa facility is a printing manufacturing plant. The plant employs approximately 150 people, depending on business activity. Robbie operates 24-hours per day, five days per week. The plant generates over 2,200 pounds of hazardous waste per month; therefore, according to the Kansas regulations, Robbie is classified as an EPA Large Quantity Generator. The facility is located in the Lenexa Industrial Park, just west of Interstate (I)-35, and south of I-435. J.C. Penney's distribution warehouse is located nearby.

Waste flammable liquid with a flash point less than 140 degrees Fahrenheit is classified as hazardous waste. This waste represents the majority of the hazardous waste generated on-site and addressed in this Plan. It is generated from cleaning various components of the printing presses and is accumulated in a 55-gallon steel satellite drum and/or a 350-gallon tote at each press. When each satellite accumulation drum or tote is filled, the container is sealed and transported to the hazardous waste storage area within three days. Within 90 days of filling the containers, the full containers are transported off-site for disposal. The details for the hazardous waste handling and disposal procedures are located in the Compliance Administrator's office.

WASTE DESCRIPTION: WASTE FLAMMABLE LIQUID (INK AND ETHYL ALCOHOL)

Volume on Site:	Between 1 and 20, 55-gallon drums, depending on the next scheduled pickup and/or between 1 and 3 350-gallon totes
Handling Method:	Steel drums, capacity of each drum is 55-gallons
DOT Emergency Guide Number:	27
EPA Waste Code:	D001 (Ignitable)

A copy of the Material Safety Data Sheets (MSDS's) are kept on the wall next to the regenerative thermal oxidizer (RTO) for use at all times. Copies are available from the Compliance Administrator.

The MSDS will be used as the source document for handling, containing, cleanup and disposal of hazardous wastes.

3.1 PRIMARY EMERGENCY PLAN COORDINATOR

1st Shift (7:00 am to 3:00 pm)

All redactions this page Ex. 6 PII

Name: George Jones
Title: Manufacturing Projects
Home Address: [redacted]
Telephone (Office): 913-492-3400, Telephone (Home): [redacted]

2nd Shift (7:00 am to 7:00 pm)

Name: Steve Johnson
Title: Print Department Team Leader
Home Address: [redacted]
Telephone (Office): 913-492-3400, Telephone (Home): [redacted]

Name: Chris Ward
Title: Print Department Team Leader
Home Address: [redacted]
Telephone (Office): 913-492-3400, Telephone (Home): [redacted]

3rd Shift (7:00 pm to 7:00 am)

Name: David Wagner
Title: Print Department Team Leader
Home Address: [redacted]
Telephone (Office): 913-492-3400, Telephone (Home): [redacted]

Name: Ron Huddleston
Title: Print Department Team Leader
Home Address: [redacted]
Telephone (Office): 913-492-3400, Telephone (Home): [redacted]

3.2 ALTERNATE EMERGENCY PLAN COORDINATOR

Name: Lisa Kist
Title: H R Coordinator
Home Address: [redacted]
Telephone (Office): 913-492-3400, VM #3400
Telephone (Home): [redacted]

Both the Primary and Alternate Emergency Plan Coordinators must:

1. Be on the facility premises or on call (available at the plant within 30 minutes) at all times.

2. Be familiar with all aspects of the Contingency Plan.
3. Be familiar with all operations and activities at the facility.
4. Be familiar with the location and the characteristics of wastes handled at the facility.
5. Be familiar with the location of records within the facility and the facility layout.
6. Have the authority to commit the resources required to carry out the Plan.

4.1 LOCAL

Dial 911 for an emergency

Lenexa Fire: 913 888-6380

Lenexa Police: 913 477-7300, (Press 5 for Police Administration)

Johnson County Sheriff's Dispatcher: 913 782-0720

Primary Hospital:
Menorah Medical Center, 5721 West 119th Street, Overland Park
Emergency Services: 913 498-6533

Johnson County Emergency Management: 913 782-3080

4.2 STATE OF KANSAS

Kansas Highway Patrol: 913-782-8100

Kansas Highway Patrol (Emergency Operations): 785 296-3102

KDHE Northeast District Office
800 W 24th Street, Lawrence, Kansas: 785 842-4600
KDHE (Daytime telephone number): 785 296-1679
KDHE (Nighttime telephone number): 785 296-0614

4.3 FEDERAL

EPA Region VII Office, Oil/Chemical Spills: 913 281-0991

National Response Center: 1 800-424-8802

4.4 CONTRACTOR

Spill Response Contractor: HazMat Response: 1-800-229-5252

5.1 FIRE/POLICE DEPARTMENT

City of Lenexa Fire Department
9620 Pflumm Road
Lenexa, Kansas 66215

Contact:

- Telephone number (Emergency): 911, once Fire Department is notified, dispatch will notify the Police Department.
- Non-emergency: (913) 888-6380

City of Lenexa Police Department
12500 West 87th Parkway
Lenexa, Kansas 66215

Contact:

- Telephone number (Emergency): 911, once Police Department is notified, dispatch will notify the Fire Department.
- Non-emergency: (913) 477-7300, then press #5 for Police Administration

Fire/Police Information:

Caller will supply as much information as possible: fire, leak or spill; material(s) involved; location of site; injuries, etc. MSDSs will be provided upon request, listing the appropriate actions to be taken.

Fire Department Personnel will provide containment and confinement services until the emergency response contractor arrives. The Fire Department is not responsible for clean up. Communications will be continuously maintained between the fire department contact and the Emergency Plan Coordinator or alternate.

The Fire Department will coordinate with the Police Department to provide required traffic control, crowd control, or evacuation.

5.2 LOCAL HOSPITAL

Menorah Medical Center
9721 West 119th Street
Overland Park, Kansas 66215

Contact:

▲ Telephone number (Emergency and/or non-emergency): (913) 498-6533.

Hospital Emergency Information:
Caller will supply as much information as possible: fire, leak or spill; material(s) involved; location of site; injuries, etc. MSDSs will be provided upon request, listing the appropriate actions to be taken.

5.3 SEWER SYSTEM CONTACTS

Johnson County Unified Waste Water Department
11811 S. Sunset Drive Suite 1100
Olathe, Kansas 66061

Contact:

▲ Telephone number (Emergency): Nelson Complex, (913) 432-3820, this is a 24-hour telephone number in case of material(s) entering the sanitary sewer system.

▲ Telephone number (Non-emergency): Administrative, Margie Wilson, telephone number: (913) 715-8500.

Sewer Emergency Information:

Caller will identify the material(s), the amount, and the point of entry for any hazardous waste that enters the sanitary sewer. MSDSs will be provided upon request, listing the appropriate actions to be taken. Johnson County Unified Waste Water Department operates the sanitary sewers, only.

5.4 Emergency Response Contactors

HAZ-MAT RESPONSE, INC.
1203 C South Parker Street
Olathe, Kansas 66061
1-800-229-5252 or 913-782-5151

Emergency Response Contractor Information:

Caller will supply as much information as possible: fire, leak or spill; material(s) involved; location of site; etc. MSDSs will be provided upon request, listing the appropriate actions to be taken. Contractor personnel will provide containment, confinement, and clean up services. Communications will be continuously maintained between the contractor and the Emergency Plan Coordinator or alternate.

1. Whenever there is an imminent or actual emergency situation, the Primary or Alternate Emergency Plan Coordinator will activate Robbie's Emergency Action Program immediately:
   a) Activate the facility alarm system to notify all facility personnel to respond appropriately.
   b) Notify appropriate State or local agencies listed in Section 4, and use the reporting form located in Attachment A.
2. Whenever there is a release, fire, or explosion, the Emergency Plan Coordinator must immediately identify the character, exact source, amount, and the extent of any released materials. He may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis.
3. Concurrently, the Emergency Plan Coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating or asphyxiating gases generated, or the effects of any hazardous surface water runoffs from water or chemical agents used to control fire and heat-induced explosions).
4. If the Emergency Plan Coordinator determines that the facility has a release, fire, or explosion which could threaten human health or the environment, he must report his findings as follows:
   a) If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify the appropriate local authorities (i.e., Lenexa Police Dept.) and be available to assist officials in deciding whether local areas should be evacuated.
   b) He must immediately notify either the government official designated as the on-scene coordinator for that geographical area or the National Response Center at 800-424-8802. A notification worksheet is located in Attachment A of this plan. The report must include:
      i) Name and telephone number of reporter;
      ii) Name and address of facility;
      iii) Time and type of incident (e.g., fire, release);
      iv) Name and quantity of material(s) involved, to the extent known;
      v) The extent of injuries, if any; and
      vi) The possible hazards to human health, or the environment.
5. During an emergency, the Emergency Plan Coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, removing or isolating containers, use of fire control structures (e.g., fire doors), systems (e.g., sprinkler systems), and equipment (e.g., fire extinguishers).
6. If the facility stops operations in response to a fire, explosion or release, the Emergency Plan Coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.
7. Immediately after an emergency, the Emergency Plan Coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a fire, explosion or release at the facility.

8. The Emergency Plan Coordinator must ensure that, in the affected area(s) of the facility:
   a) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
   b) All emergency equipment listed in Section 7.4 is available for its intended use before operations are resumed.
9. The owner or operator must notify the EPA Region VII Administrator, and appropriate State and local authorities, that the facility is in compliance with Item 8 of this section before operations are resumed in the affected area(s) of the facility.
10. The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the EPA Region VII Administrator. The report must include:
    a) Name, address, and telephone number of the owner or operator;
    b) Name, address, and telephone number of the facility;
    c) Date, time, and type of incident (e.g., fire, explosion)
    d) Name and quantity of material(s) involved
    e) The extent of injuries, if any;
    f) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
    g) Estimated quantity and disposition of recovered material that resulted from the incident.

7.1 EMERGENCY EXITS

Attachment B contains a sketch of the floor plan (Map) for the facility showing exit routes and exit locations. The emergency exits are marked by lighted "EXIT" signs, which have battery backup in case of power failure. Interior doors along exit routes are marked by "FIRE EXIT" signs and have emergency lights overhead with battery backup.

7.2 COMMUNICATION SYSTEM

The facility is equipped with a telephone paging system audible in the office and production areas. This system is to be used by the on-site Emergency Plan Coordinator to communicate to all personnel what to do in an emergency situation.

7.3 FIRE EXTINGUISHERS

Multiple extinguishers are located near all production equipment, as well as in the office area. Each extinguisher is inspected annually. The Map contains the extinguisher locations. A "Fire Extinguisher" placard is located above the extinguishers in the production area. The following classes are available for the following types of fires:

A, B, C - Dry Chemical for any type of fire (Paper, Wood, Chemical, Electrical)
B, C - Carbon Dioxide (Chemical or Electrical)
A, B, C - Halon (Paper, Wood, Chemical, Electrical)

7.4 SPILL CONTROL EQUIPMENT

Absorbent material is located in the ink room to control spills. The absorbent material is in the form of pads, pillows and socks. The spill equipment is identified as PIG Spill Kit #202. The equipment includes the following; a salvage drum (61 gallon capacity), a minimum of five absorbent pads, a minimum of two absorbent pillows, and a minimum of ten absorbent socks. In case of small (55-gallons or less) spills, the absorbent material is placed around the spill to contain the liquid. Additional pads and pillows are used to absorb the excess liquid. Used absorbent is placed in the salvage drum and disposed of per the appropriate waste disposal company. If a 350-gallon tote ruptures, Haz Mat Response may be called to assist with containment and clean up if the facility cannot control the spill.

7.5 DECONTAMINATION EQUIPMENT

Eyewash stations are located in the manufacturing area and identified on the map. These stations provide two streams of water for flushing chemicals from both eyes simultaneously.

7.6 FIRST AID STATIONS

First aid stations are located in the manufacturing area as identified on the Map.

8.1 PRIMARY EVACUATION ROUTES

All exits may be used for emergency evacuation. In the event an exit is blocked, employees will proceed to the next nearest accessible exit and leave the building. Once employees leave the building, they are to meet in the assignment area as noted in Robbie's Emergency Action Program, and noted on the Map.

8.2 EVACUATION SIGNALS

The plant is equipped with a loudspeaker/paging system. Employees will be instructed by telephone paging system to follow the evacuation procedure. In the event the paging system fails, the Emergency Plan Coordinator or Alternate Emergency Plan Coordinator and alternates will initiate evacuation through word of mouth.

Operating Equipment: Machine Operators should follow normal shutdown procedures and eliminate power to each machine.

8.3 EVACUATION PROCEDURE

All employees are to meet according to the areas identified in the Emergency Action Program. All the Evacuation Coordinators will report to the Emergency Plan Coordinator the status of people reporting to them. This report includes all people who are out and anyone who remains in the building. No employee is to leave the meeting area until instructed to do so.

This Plan must be reviewed, and immediately amended, if necessary, whenever:

- ▲ Applicable regulations are revised;
- ▲ The plan fails in an emergency;
- ▲ The facility changes, in its design, construction, operation, maintenance, or other circumstances, in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- ▲ The list of Emergency Plan Coordinators changes; or
- ▲ The list of emergency equipment changes.

9.1 USED OIL

Used oil is generated at the facility from Air Compressors and Hydraulic pumps on the presses. Used oil is stored in locked 55-gallon drums under the stairs outside the maintenance shop.

9.2 HAZARDOUS WASTE GENERATED AT PRESS

Solvents at the presses used for cleaning will become a "Hazardous Waste" when the press operator determines the solvent is to dirty to continue using for cleaning purposes.

10. MAILING LIST

A copy of this Plan has been submitted to all the local police departments, fire departments, hospitals, state and local emergency response teams that may be called upon to provide emergency services. Copies of the certified mail receipts are filed with this Plan

Name	Address	Date Mailed

ATTACHMENT A

NOTIFICATION WORKSHEET

NOTIFICATION WORKSHEET

Initial telephone notification

FACTS YOU WILL NEED TO KNOW:

I. Facility Name: Robbie Manufacturing, Inc.

1. Facility address:

   10810 Mid-America Avenue
   Lenexa, Kansas 66219
   Johnson County

2. Facility Telephone Number:

   (913) 492-3400

3. Responsible Party:

   Mr. Irv Robinson, Owner

4. Environmental Contact:

   George Jones
   Telephone Number: (913) 492-3400

II. Agency name and telephone number:

_____

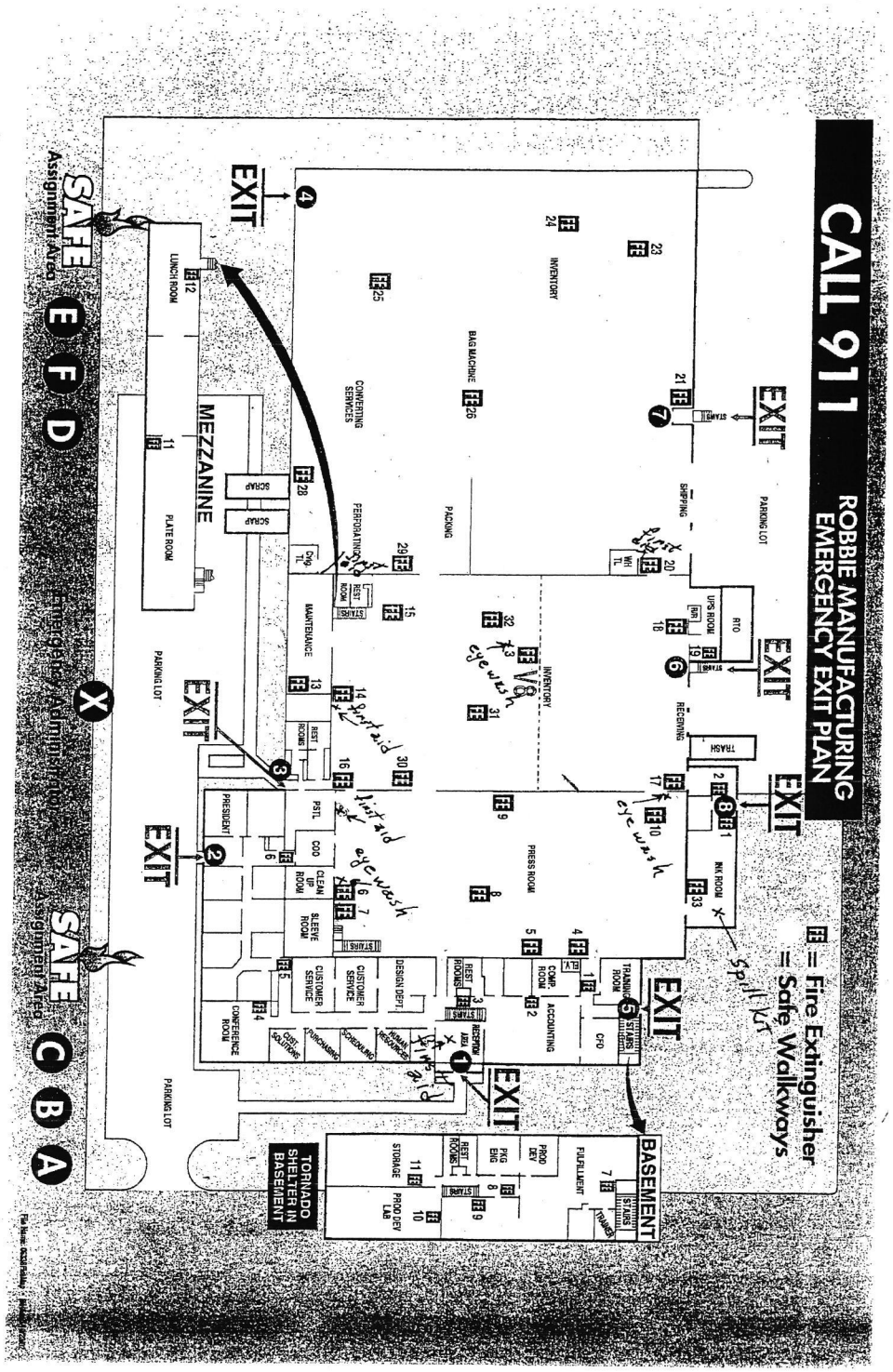
III. Information to include with the report:

1. Date, time of the incident: _____
2. Type of incident (e.g., fire, explosion): _____
3. Name and quantity of material(s) involved: _____
4. The extent of injuries, if any: _____
5. An assessment of actual or potential hazards to human health or the environment, where this is applicable: _____
6. Estimated quantity and disposition of recovered material that resulted from the incident: _____

ATTACHMENT B

A SKETCH OF THE FACILITY (MAP)

Robbie Manufacturing, Inc.



Attachment # 4

KSD062712013 MIDLAND RESEARCH LABORATORIES INC

EPA Region:07 **Extract Flag:** Y **Facility Identifier:** **County:** JOHNSON

Universes

Generator: N Transporter: N Active: N
Operating TSDF: ----- IC In Place: N EI Indicator (HE / GW): N / N

Activity Location: KS **Source Type: Notification** **Seq. Number: 4** **Receive Date: 31 MAR 2006**

Other/Previous Site Name: MIDLAND RESEARCH LABORATORIES INC

Location Address: 10850 MID AMERICA AVE
LENEXA, KS 66219-1245

Mailing Address: 10850 MID AMERICA AVE
LENEXA, KS 66219-1245
UNITED STATES

Contact Person For Source Information
FREDERICK C. HOPKINS
(913) 544-1638
FREDHOPKINS@KC.RR.COM
10850 MID AMERICA AVE
LENEXA, KS 66219-1245
UNITED STATES

Owner (current)
ECOLAB INC
From: 02/25/2005 To:
370 WABASHA ST N
ST PAUL, MN 55102-1390
ST PAUL
Type: Private
Phone: (651) 293-2233

Owner (current)
MIDLAND RESEARCH LABORATORIES INC
From: 06/17/1981 To: 02/24/2005
MID AMERICA AVE
LENEXA, KS 66219-1245
LENEXA
Type: Private
Phone: (913) 888-0560

Operator (current)
MIDLAND RESEARCH LABORATORIES INC
From: 06/17/1981 To:
Type: Private
Phone:

Land Type: Private Non Notifier: No Commercial Availability: Unknown Tsd Date:
Accessibility: No. Employees: 0 State District: 04

NAICS Codes: 325998 All Other Miscellaneous Chemical Product and Preparation Manufacturing

[redacted] Ex. 2
Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: KS-N NON-REGULATED GENERATOR/NOT A GENERATOR

Other Hazardous Waste Generator Activities
- Importer Activity: No
- Mixed Waste Generator: No
- Transporter Activity: No
- TSD Activity: No
- Recycler Activity: No

Exempt Boiler and/or Industrial Furnace
- Small Quantity Onsite Burner Exemption: No
- Smelting, melting, Refining Furnace Exemption: No

Used Oil Activities
- Used Oil Transporter Activity
  - Transporter: No
  - Transfer Facility: No
- Used Oil Processor and/or Re-refiner Activity
  - Processor: No
  - Refiner: No
- Underground Injection Control: No
- Off-Specification Used Oil Burner: No
- Used Oil Fuel Marketer Activity
  - Marketer who directs shipment off-specification used oil to off-specification used oil burner: No
  - Marketer who first claims the used oil meets the specifications: No
- Destination Facility for Universal Waste: No

State Activities:

Owner	Type	Description
KS	HWPL	ONE TIME LQG, FEES PAID, NOW EXEMPT
KS	HWR05	2005 LQG BIENNIAL REPORT FEES PAID

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D022, D023, D025, D026, D028, D036, D038, D039, F001, F002, F003, F004, F005, F006, F008, U028, U080, U101, U147, U171, U188, U209, U211, U228, U239

Activity Location: KS **Source Type: Biennial Report** **Seq. Number: 1** **Receive Date: 28 MAR 2006** **Report Cycle: 2005**

Other/Previous Site Name: MIDLAND RESEARCH LABORATORIES INC

Location Address: 10850 MID AMERICA AVE
LENEXA, KS 66219-1245

Mailing Address: 10850 MID AMERICA AVE
LENEXA, KS 66219-1245
UNITED STATES

KSD062712013 MIDLAND RESEARCH LABORATORIES INC

Continued...

Contact Person For Source Information	FREDERICK C. HOPKINS (913) 544-1638 FREDHOPKINS@KC.RR.COM	UNITED STATES

Owner (current)
ECOLAB INC
From: 01/01/2005 To:
370 N WABASHA ST
ST PAUL, MN 55102-1390
ST PAUL
Type: Private
Phone:

Operator (current)
ECOLAB INC
From: 01/01/2005 To:
10850 MID AMERICA AVE
LENEXA, KS 66219-1245
LENEXA
Type: Private
Phone:

Land Type: Private | Non Notifier: No | Commercial Availability: Unknown | Tsd Date:

Accessibility: | No. Employees: | State District:

NAICS Codes: 325998 All Other Miscellaneous Chemical Product and Preparation Manufacturing

[redacted]

Regulated Waste Activities

Ex. 2

Hazardous Waste Generator Status - Federal: Not a Generator; State: KS-N NON-REGULATED GENERATOR/NOT A GENERATOR

Other Hazardous Waste Generator Activities

Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
TSD Activity:	No
Recycler Activity:	No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption:	No
Smelting, melting, Refining Furnace Exemption:	No

Used Oil Activities

Used Oil Transporter Activity
Transporter: No
Transfer Facility: No

Used Oil Processor and/or Re-refiner Activity
Processor: No
Refiner: No

Underground Injection Control: No

Off-Specification Used Oil Burner: No

Used Oil Fuel Marketer Activity
Marketer who directs shipment off-specification used oil to off-specification used oil burner: No
Marketer who first claims the used oil meets the specifications: No

Destination Facility for Universal Waste: No

Universal Waste Activities:

Description	Generated	Accumulated/ Managed
Batteries	N	N
Lamps	N	N
Pesticides	N	N
Mercury containing equipment	N	N

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001, D002, D004, D005, D006, D007, D008, D009, D011, D028, F003, F027, P050, P098, P106, U002, U003, U007, U122, U144, U188, U220, U240

Biennial Report Information

Total Quantity Reported (Tons): Generated: 25 Managed: 0 Shipped: 25 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
OUTDATED PRODUCTS, ACIDIC LIQUIDS				
3	0		3	H111 - STABILIZATION OR CHEMICAL FIXATION
EPA Waste Codes: D002				
OBSOLETE WATER TREATMENT ADDITIVES, CAUSTIC AQUEOUS SOLUTIONS WITH CHROME				
3	0		3	H111 - STABILIZATION OR CHEMICAL FIXATION
EPA Waste Codes: D002, D007				
OBSOLETE WATER TREATMENT ADDITIVES, PHOSPHORIC ACID, SULFURIC ACID				
2	0		2	H040 - INCINERATION
EPA Waste Codes: D002				

KSD062712013 MIDLAND RESEARCH LABORATORIES INC

Continued...

Top 10 GM Forms Summary - continued (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
OBSOLETE WATER TREATMENT ADDITIVE - FLAMMABLE LIQUID				
1	0		1	H061 - FUEL BLENDING
EPA Waste Codes: D001, F003				
OUTDATED WATER TREATMENT PRODUCT - LEAN WATERS				
1	0		1	H040 - INCINERATION
EPA Waste Codes: D001				
OBSOLETE LIQUID PESTICIDES - INSECTICIDES, HERBICIDES				
1	0		1	H040 - INCINERATION
EPA Waste Codes: P050, U240				
OBSOLETE WATER TREATMENT ADDITIVES, SULFURIC ACID WITH MORE THAN 51% ACID				
1	0		1	H122 - EVAPORATION
EPA Waste Codes: D002				
OUTDATED PRODUCTS, ACIDIC LIQUIDS WITH CHROME				
1	0		1	H040 - INCINERATION
EPA Waste Codes: D002, D007				
OBSOLETE WATER TREATMENT ADDITIVE, TRIETHANOLAMINE				
0	0		0	H040 - INCINERATION
EPA Waste Codes: D002				
OBSOLETE WATER TREATMENT ADDITIVES, SODIUM PENTACHLORPHENATE				
0	0		0	H131 - LAND TREATMENT OR APPLICATION
EPA Waste Codes: F027				

Activity Location: KS **Source Type: Notification** **Seq. Number: 3** **Receive Date: 01 MAR 2005**

Other/Previous Site Name: MIDLAND RESEARCH LABORATORIES INC

Location Address: 10850 MID AMERICA AVE
LENEXA, KS 66219-1245

Mailing Address: 10850 MID AMERICA AVE
LENEXA, KS 66219-1245
UNITED STATES

Contact Person For Source Information
FREDERICK C. HOPKINS
(913) 888-0560 ext. 29
FHOPKINS@MIDLANDRESEARCHLABSINC.COM
10850 MID AMERICA AVE
LENEXA, KS 66219-1245
UNITED STATES

Owner (current)
ECOLAB INC
From: 02/25/2005 To:
370 WABASHA ST N
ST PAUL, MN 55102-1390
ST PAUL
Type: Private
Phone: (651) 293-2233

Owner (current)
MIDLAND RESEARCH LABORATORIES INC
From: 06/17/1981 To: 02/24/2005
MID AMERICA AVE
LENEXA, KS 66219-1245
LENEXA
Type: Private
Phone: (913) 888-0560

Operator (current)
MIDLAND RESEARCH LABORATORIES INC
From: 06/17/1981 To:
Type: Private
Phone:

Land Type: Private
Non Notifier: No
Commercial Availability: Unknown
Tsd Date:
Accessibility:
No. Employees: 0
State District: 04

NAICS Codes: 325998 All Other Miscellaneous Chemical Product and Preparation Manufacturing

[redacted] Ex. 2

KSD062712013 MIDLAND RESEARCH LABORATORIES INC

Continued...

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: KS-N NON-REGULATED GENERATOR/NOT A GENERATOR

Other Hazardous Waste Generator Activities

Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
TSD Activity:	No
Recycler Activity:	No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption:	No
Smelting, melting, Refining Furnace Exemption:	No

Used Oil Activities

Used Oil Transporter Activity

Transporter:	No
Transfer Facility:	No

Used Oil Processor and/or Re-refiner Activity

Processor:	No
Refiner:	No

Off-Specification Used Oil Burner:	No

Used Oil Fuel Marketer Activity

Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Marketer who first claims the used oil meets the specifications:	No

Underground Injection Control:	No
Destination Facility for Universal Waste:	No

State Activities:

Owner	Type	Description
KS	HWPL	ONE TIME LQG, FEES PAID, NOW EXEMPT

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D022, D023, D025, D026, D028, D036, D038, D039, F001, F002, F003, F004, F005, F006, F008, U028, U080, U101, U147, U171, U188, U209, U211, U228, U239

Activity Location: KS Source Type: Notification Seq. Number: 2 Receive Date: 03 MAR 2004

Other/Previous Site Name: MIDLAND RESEARCH LABORATORIES INC

Location Address: 10850 MID AMERICA AVE
LENEXA, KS 66219-1245

Mailing Address: 10850 MID AMERICA AVE
LENEXA, KS 66219-1245
UNITED STATES

Contact Person For Source Information
FREDERICK C. HOPKINS
(913) 888-0560 ext. 29
FHOPKINS@MIDLANDRESEARCHLABSINC.COM
10850 MID AMERICA AVE
LENEXA, KS 66219-1245
UNITED STATES

Owner (current)
MIDLAND RESEARCH LABORATORIES INC
From: 06/17/1981 To:
10850 MID AMERICA AVE
LENEXA, KS 66219-1245
LENEXA
Type: Private
Phone: (913) 888-0560

Operator (current)
MIDLAND RESEARCH LABORATORIES INC
From: 06/17/1981 To:
Type: Private
Phone:

Land Type: Private Non Notifier: No Commercial Availability: Unknown Tsd Date:
Accessibility: No. Employees: 0 State District: 04

NAICS Codes: 325998 All Other Miscellaneous Chemical Product and Preparation Manufacturing

[redacted]

Ex. 2

RCRA Site Detail

KSD062712013 MIDLAND RESEARCH LABORATORIES INC

Continued...

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: KS-N NON-REGULATED GENERATOR/NOT A GENERATOR

Other Hazardous Waste Generator Activities

Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
TSD Activity:	No
Recycler Activity:	No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption:	No
Smelting, melting, Refining Furnace Exemption:	No

Used Oil Activities

Used Oil Transporter Activity

Transporter:	No
Transfer Facility:	No

Used Oil Processor and/or Re-refiner Activity

Processor:	No
Refiner:	No

Off-Specification Used Oil Burner:	No

Used Oil Fuel Marketer Activity

Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Marketer who first claims the used oil meets the specifications:	No

Underground Injection Control:	No
Destination Facility for Universal Waste:	No

State Activities:

Owner	Type	Description
KS	HWPL	ONE TIME LQG, FEES PAID, NOW EXEMPT

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D022, D023, D025, D026, D028, D036, D038, D039, F001, F002, F003, F004, F005, F006, F008, U028, U080, U101, U147, U171, U188, U209, U211, U228, U239

Activity Location: KS **Source Type: Other - B** **Seq. Number: 1** **Receive Date: 25 FEB 2004** **Report Cycle: 2003**

Other/Previous Site Name: MIDLAND RESEARCH LABORATORIES INC

Location Address: 10850 MID AMERICA AVE
LENEXA, KS 66219-1245

Mailing Address: 10850 MID AMERICA AVE
LENEXA, KS 66219-1245
UNITED STATES

Contact Person For Source Information
FREDERICK C. HOPKINS
(913) 888-0560 ext. 29
FHOPKINS@MIDLANDRESEARCHLABSINC.COM
UNITED STATES

Owner (current)
MIDLAND RESEARCH LABORATORIES INC
From: 06/17/1981 To:
10850 MID AMERICA AVE
LENEXA, KS 66219-1245
LENEXA
Type: Private
Phone:

Operator (current)
MIDLAND RESEARCH LABORATORIES INC
From: 06/17/1981 To:
Type: Private
Phone:

Land Type: Private Non Notifier: No Commercial Availability: Unknown Tsd Date:
Accessibility: No. Employees: State District:

NAICS Codes: 325998 All Other Miscellaneous Chemical Product and Preparation Manufacturing

[redacted]

Ex. 2

KSD062712013 MIDLAND RESEARCH LABORATORIES INC

Continued...

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: KS-L LQG (LARGE QUANTITY GENERATOR)

Other Hazardous Waste Generator Activities

Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	No
TSD Activity:	No
Recycler Activity:	No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption:	No
Smelting, melting, Refining Furnace Exemption:	No

Used Oil Activities

Used Oil Transporter Activity

Transporter:	No
Transfer Facility:	No

Used Oil Processor and/or Re-refiner Activity

Processor:	No
Refiner:	No

Underground Injection Control:	No
Off-Specification Used Oil Burner:	No

Used Oil Fuel Marketer Activity

Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Marketer who first claims the used oil meets the specifications:	No
Destination Facility for Universal Waste:	No

Universal Waste Activities:

Description	Generated	Accumulated/ Managed
Batteries	N	N
Lamps	N	N
Pesticides	N	N
Mercury containing equipment	N	N

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001, F003

Biennial Report Information

No Biennial Report detail information available.

Activity Location: KS Source Type: Notification Seq. Number: 1 Receive Date: 04 NOV 1999

Other/Previous Site Name: MIDLAND RESEARCH LABORATORIES INC

Location Address:	10850 MID AMERICA AVE LENEXA, KS 66219
Mailing Address:	10850 MID AMERICA AVE LENEXA, KS 66215

Contact Person For Source Information	FREDERICK HOPKINS (913) 888-0560	10850 MID AMERICA AVE LENEXA, KS 66215

Owner (current)
ASSOCIATED CHEMICALS & SVC
From: To:

10850 MID AMERICA AVE
LENEXA, KS 66219

Type: Private
Phone: (913) 888-6495

Land Type: Private Non Notifier: No Commercial Availability: Non-Commercial Tsd Date:

Accessibility: No. Employees: State District: 04

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: HQ-N Not a Generator

Other Hazardous Waste Generator Activities

Importer Activity:	No
Mixed Waste Generator:	Unknown
Transporter Activity:	No
TSD Activity:	No
Recycler Activity:	No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption:	No
Smelting, melting, Refining Furnace Exemption:	No

Used Oil Activities

Used Oil Transporter Activity

Transporter:	No
Transfer Facility:	No

Used Oil Processor and/or Re-refiner Activity

Processor:	No
Refiner:	No

Underground Injection Control:	No
Off-Specification Used Oil Burner:	No

Used Oil Fuel Marketer Activity

Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Marketer who first claims the used oil meets the specifications:	No
Destination Facility for Universal Waste:	

Description of Hazardous Wastes (as reported on Site Identification Form)

KSD062712013 MIDLAND RESEARCH LABORATORIES INC

Continued...

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: P090

Activity Location: KS Source Type: Implementer Seq. Number: 1 Receive Date: 22 SEP 1999

Other/Previous Site Name: MIDLAND RESEARCH LABORATORIES INC

Location Address:	10850 MID AMERICA AVE LENEXA, KS 66219
Mailing Address:	10850 MID AMERICA AVE LENEXA, KS 66215

Land Type: Private | Non Notifier: No | Commercial Availability: Non-Commercial | Tsd Date:

Accessibility: | No. Employees: | State District: 04

NAICS Codes: 325998 All Other Miscellaneous Chemical Product and Preparation Manufacturing

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: HQ-N Not a Generator

Other Hazardous Waste Generator Activities

Importer Activity:	Unknown
Mixed Waste Generator:	Unknown
Transporter Activity:	No
TSD Activity:	No
Recycler Activity:	No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption:	Unknown
Smelting, melting, Refining Furnace Exemption:	Unknown

Used Oil Activities

Used Oil Transporter Activity	
Transporter:	No
Transfer Facility:	No
Used Oil Processor and/or Re-refiner Activity	
Processor:	No
Refiner:	No
Underground Injection Control:	No
Off-Specification Used Oil Burner:	No
Used Oil Fuel Marketer Activity	
Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Marketer who first claims the used oil meets the specifications:	No
Destination Facility for Universal Waste:	

Other Permits:

Number	Description	Owner	Type	Type Description
27581KS01		HQ	L	FATES

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: NONE

*** End of Report ***

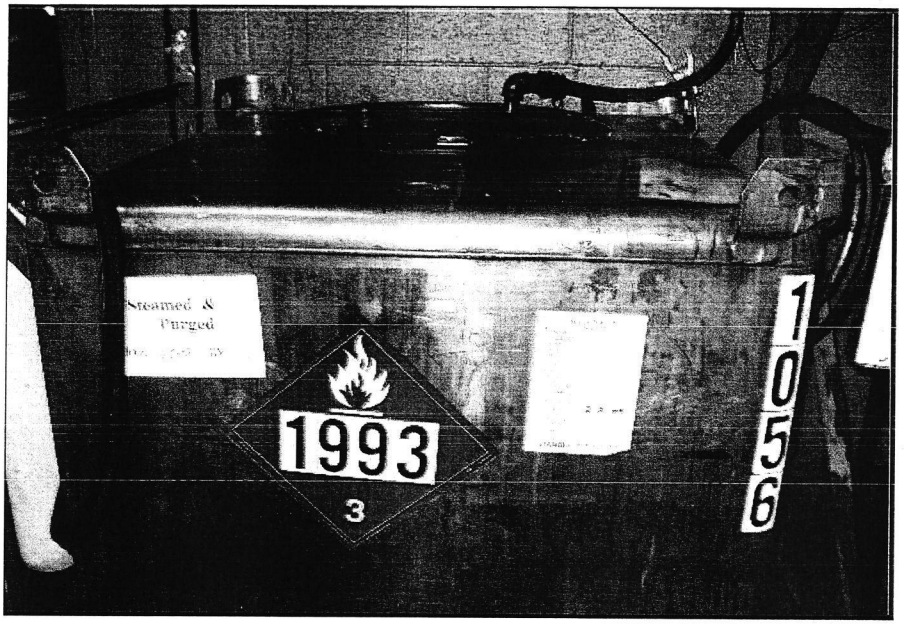
KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
NE District Office

The digital photographs contained in this report were recorded directly to an archival electronic file prior to viewing on a computer system. KDHE certified that such digital photographs are thus identical to the digital photographs taken during the investigation.

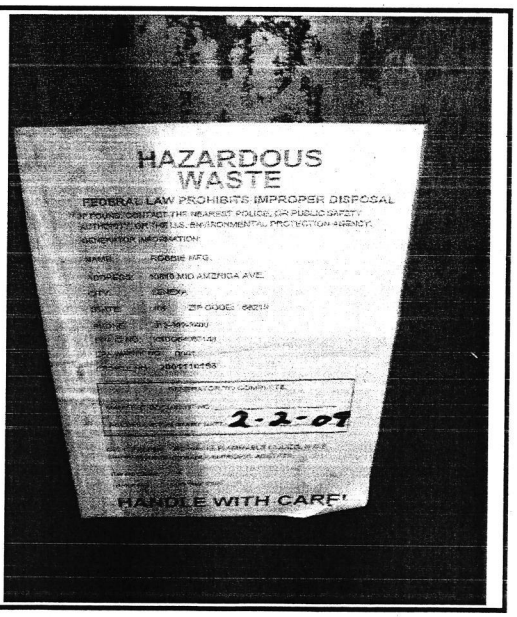
Site Name: Robbie Manufacturing
Address: 10810 Mid-America Ave.
County: Johnson
Legal:

EPA ID No.: KSD 054 080 148
City: Lenexa
Camera: Lumix LCZ
Taken By: Laura D. Routh

Robbie Mnfg 001 - 020



Picture No.: 1
Archive Disc File No.: 001
Date: February 10, 2009
Time: 2:11 pm
Location: V9 press
Direction Faced: W
Weather Conditions: warm, sunny
Comments:
Tote of ink and solvent waste, partially full.



Picture No.: 2
Archive Disc File No.: 002
Date: February 10, 2009
Time: 2:12 pm
Location: V9 press
Direction Faced: W
Weather Conditions: warm, sunny
Comments:
Close up of tote label.

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
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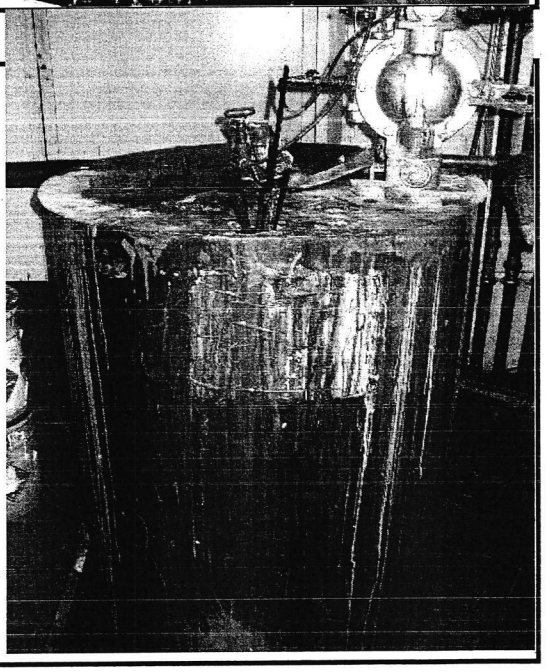
Site Name: Robbie Manufacturing
Address: 10810 Mid-America Ave.
County: Johnson
Legal: 0

EPA ID No.: KSD 054 080 148
City: Lenexa
Camera: Lumix LCZ
Taken By: Laura D. Routh

Picture No.: 3
Archive Disc File No.: 007
Date: February 10, 2009
Time: 2:12 pm
Location: central storage area
Direction Faced: down
Weather Conditions: warm, sunny
Comments:
Rags awaiting centrifuge, in storage area. Drum is not marked with the words hazardous waste. Drum was opened for photo. Rags throughout plant are collected in fire safe closing cans and transferrred to drums prior to processing by Walker Towel.



Picture No.: 4
Archive Disc File No.: 011
Date: February 10, 2009
Time: 2:12 pm
Location: wash out /reclaim area
Direction Faced: SSW
Weather Conditions: warm, sunny
Comments:
Tank in wash-up area. A label of some kind is visible beneath the ink on the outside of the tank. The tank was not labelled with the words hazardous waste, and was declared by George Jones to be a process tank and thus not subject to regulation. Mr. Johnson stated that the tank was used to collect and accumulate waste ink and solvent from wash up system, prior to it being transfered into waste tote.

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Waste Management Programs
NE District Office

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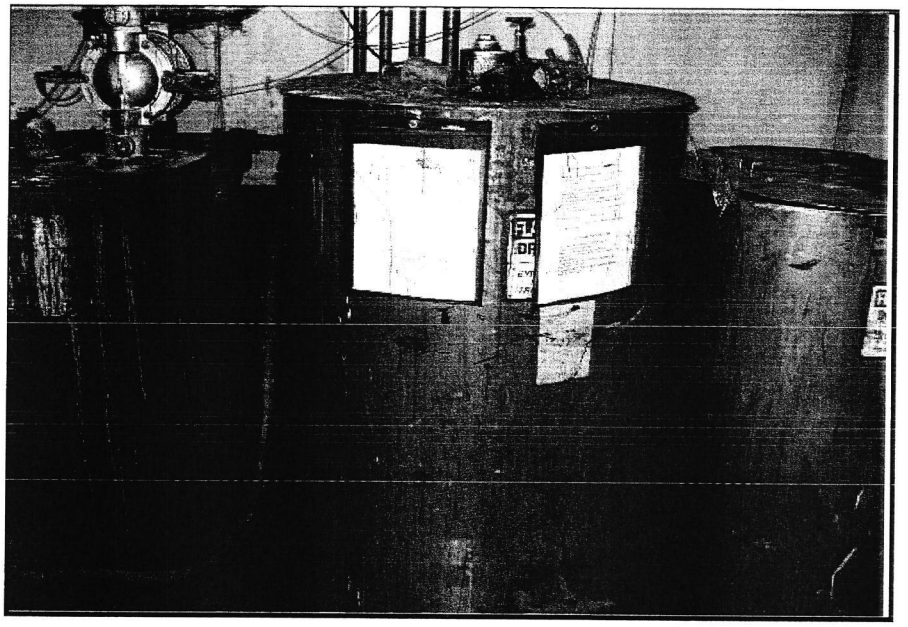
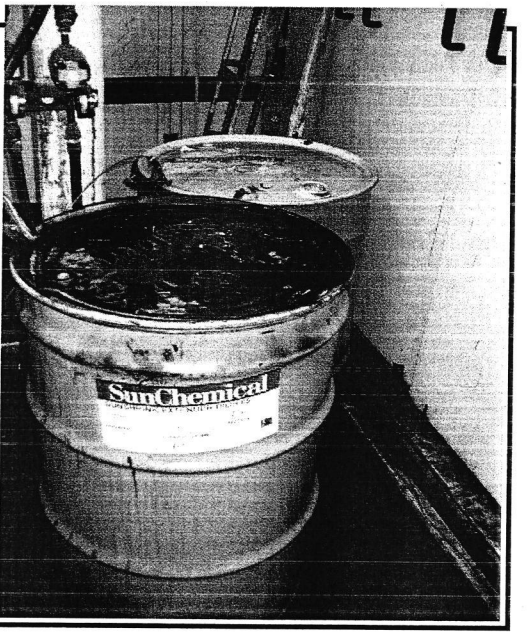
Site Name:	Robbie Manufacturing	**EPA ID No.:**	KSD 054 080 148
Address:	10810 Mid-America Ave.	**City:**	Lenexa
County:	Johnson	**Camera:**	Lumix LCZ
Legal:	0	**Taken By:**	Laura D. Routh



Picture No.:	5
Archive Disc File No.:	012
Date:	February 10, 2009
Time:	not recorded
Location:	washout/reclaim area
Direction Faced:	S
Weather Conditions:	warm, sunny
Comments:	
The other two tanks in the wash-up/reclaim area.	



Picture No.:	6
Archive Disc File No.:	013
Date:	February 10, 2009
Time:	not recorded
Location:	central storage area
Direction Faced:	not recorded
Weather Conditions:	warm, sunny
Comments:	
Drum of solvent used to dip ink pots for cleaning. Drum in back of photo is new product.	

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
NE District Office

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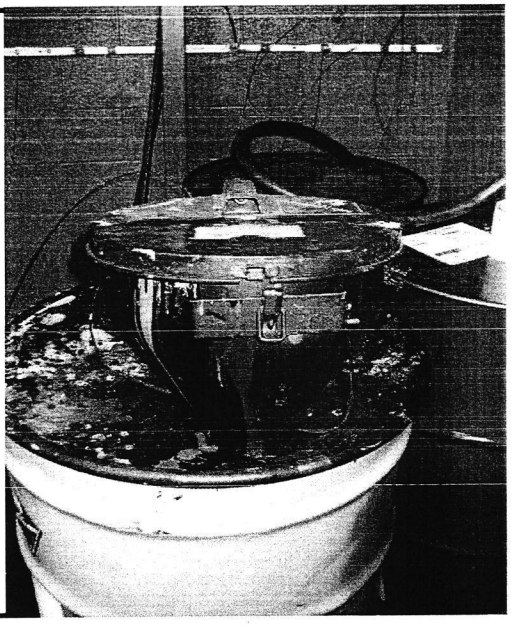
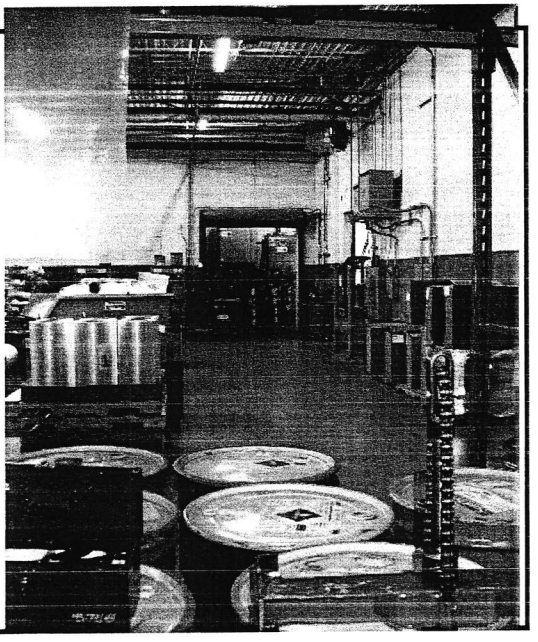
Site Name: Robbie Manufacturing
Address: 10810 Mid-America Ave.
County: Johnson
Legal: 0

EPA ID No.: KSD 054 080 148
City: Lenexa
Camera: Lumix LCZ
Taken By: Laura D. Routh



Picture No.: 7
Archive Disc File No.: 015
Date: February 10, 2009
Time: Not recorded
Location: satellite accumulation area
Direction Faced: SE
Weather Conditions: warm, sunny
Comments:
Funnel with incomplete seal between lid and bowl, on drum of hazardous waste in satellite accumulation area.



Picture No.: 8
Archive Disc File No.: 019
Date: February 10, 2009
Time: Not recorded
Location: storage area by totes
Direction Faced: N
Weather Conditions: warm, sunny
Comments:
Photo taken in waste tote storage area, shows doorway of ink room (where waste is also stored) in distance. Not proximity of waste in storage to ink room where spill kit is located.

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
NE District Office

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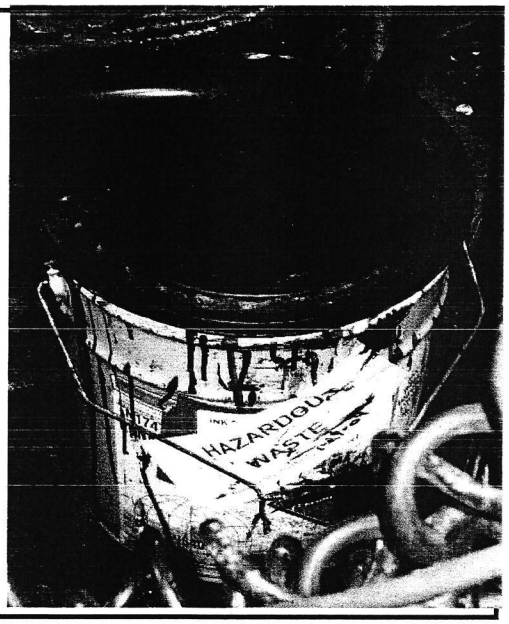
Site Name:	Robbie Manufacturing	**EPA ID No.:**	KSD 054 080 148
Address:	10810 Mid-America Ave.	**City:**	Lenexa
County:	Johnson	**Camera:**	Lumix LCZ
Legal:	0	**Taken By:**	Laura D. Routh



Picture No.:	9
Archive Disc File No.:	020
Date:	February 10, 2009
Time:	not recorded
Location:	FNK press
Direction Faced:	down
Weather Conditions:	warm, sunny
Comments:	collection bucket for drips of waste ink and solvent beneath press.

Picture No.:	10
Archive Disc File No.:	
Date:	February 10, 2009
Time:	
Location:	
Direction Faced:	
Weather Conditions:	warm, sunny
Comments:	